

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE NATIONAL PRESCRIPTION | MDL No. 2804
5 OPIATE LITIGATION |
6 This Document Relates to: | Case No. 17-MD-2804
7 The County of Summit, Ohio, | Judge Dan Aaron Polster
8 et al., v. |
9 Purdue Pharma L.P., et al. |
10 Case No. 17-op-45004 |
11 The County of Cuyahoga v. |
12 Purdue Pharma L.P., et al. |
13 Case No. 18-op-45090 |
14 City of Cleveland, Ohio v. |
15 Purdue Pharma L.P., et al. |
16 Case No. 18-op-45132 |

17
18 TUESDAY, JANUARY 22, 2019
19
20 - - -

21 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
22 CONFIDENTIALITY REVIEW
23 - - -

24 Videotaped deposition of EMILY HALL, held at
25 Foley & Lardner LLP, One Biscayne Tower, 2
26 Biscayne Boulevard, Suite 1900, Miami, Florida,
27 commencing at 9:15 a.m., on the above date,
28 before Kelly J. Lawton, Registered Professional
29 Reporter, Licensed Court Reporter, Certified
30 Court Reporter.

31 - - -
32 GOLKOW LITIGATION SERVICES
33 877.370.3377 ph | 917.591.5672 fax
34 deps@golkow.com

1 APPEARANCES:

2 WEITZ & LUXENBERG

BY: ADAM L. STOLTZ, ESQUIRE

3 JOSEPHINE A. REINA, ESQUIRE

700 Broadway

4 New York, New York 10003

(212) 558-1310

5 astoltz@weitzlux.com

jreina@weitzlux.com

6 Representing the Plaintiffs

7

8 FOLEY & LARDNER LLP

BY: KATY E. KOSKI, ESQUIRE

9 111 Huntington Avenue

Boston, Massachusetts 02199

10 (617) 342-4000

kkoski@foley.com

11 Representing Anda, Inc., and the witness

12

13 REED SMITH LLP

BY: CRISTINA CÁRDENAS, ESQUIRE

14 1001 Brickell Bay Drive, Suite 900

Miami, Florida 33131

15 (786) 747-0207

ccardenas@reedsmith.com

16 Representing AmerisourceBergen Corporation and

AmerisourceBergen Drug Corporation

17

18

19

20

21

22

23

24

1 APPEARANCES VIA TELEPHONE AND STREAM:

2 JONES DAY

3 BY: NICHOLAS HODGES, ESQUIRE
4 4655 Executive Drive, Suite 1500
5 San Diego, California 92121-3134
6 (858) 314-1200
nhodges@jonesday.com
Representing Walmart

7 ARNOLD & PORTER

8 BY: WREDE SMITH, ESQUIRE
9 601 Massachusetts Avenue, NW
10 Washington, DC 20001-3743
11 (202) 942-5000
12 wrede.smith@arnoldporter.com
Representing Endo Health Solutions Inc., Endo
Pharmaceuticals Inc., Par Pharmaceutical, Inc.,
Par Pharmaceutical Companies, Inc.,
(f/k/a Par Pharmaceutical Holdings, Inc.)

13 COVINGTON & BURLING LLP

14 BY: REBECCA G. VAN TASSELL, ESQUIRE
15 1999 Avenue of the Stars
16 Los Angeles, California 90067-4643
17 (424) 332-4768
rvantassell@cov.com
Representing McKesson Corporation

18 KIRKLAND & ELLIS

19 BY: TUCKER HUNTER, ESQUIRE
20 300 North LaSalle Drive
21 Chicago, Illinois 60654
22 (312) 862-2000
tucker.hunter@kirkland.com
Representing Allergan Finance LLC

23 ALSO PRESENT:

24 ANTHONY BARBARO, Videographer

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THE VIDEOGRAPHER: We are now on the record.

3

My name is Anthony Barbaro. I'm a videographer

4

for Golkow Litigation Services. Today's date is

5

January 22nd, 2019, and the time is 9:15 a.m.

6

This video deposition is being held at

7

2 South Biscayne Boulevard, Suite 1900, in Miami,

8

Florida 33131, In Re: The National Prescription

9

Opioid Litigation for the United States District

10

Court, Northern District of Ohio, Eastern

11

Division. The deponent is Emily Hall.

12

Counsel, would you now please identify

13

yourselves for the record.

14

MR. STOLTZ: Adam Stoltz for the plaintiffs.

15

MS. KOSKI: Katy Koski for Anda, Inc., and

16

the witness.

17

MS. CARDENAS: Cristina Cardenas for

18

AmerisourceBergen from Reed Smith.

19

THE VIDEOGRAPHER: Counsel on the phone?

20

MR. SMITH: This is Reed Smith from Arnold &

21

Porter representing Endo & Par.

22

MR. HUNTER: This is Tucker Hunter, Kirkland

23

& Ellis, on behalf of Allergan Finance, LLC.

24

MR. HODGES: This is Nick Hodges from Jones

1 Day on behalf of Walmart.

2 MS. VAN TASSELL: This is Rebecca Van Tassell
3 from Covington & Burling on behalf of McKesson.

4 THE VIDEOGRAPHER: The court reporter today
5 is Kelly Lawton, and she will now swear in the
6 witness.

7 THE COURT REPORTER: Ma'am, would you please
8 raise your right hand.

9 Do you swear or affirm the testimony you're
10 about to give will be the truth, the whole truth,
11 and nothing but the truth?

12 THE WITNESS: Yes, ma'am.

13 THE COURT REPORTER: Thank you.

14 EMILY HALL, called as a witness by the
15 Plaintiffs, having been first duly sworn, testified
16 as follows:

17 DIRECT EXAMINATION

18 BY MR. STOLTZ:

19 Q. So, Emily, what is your current occupation?

20 A. I am the senior manager of DEA compliance.

21 Q. And what is DEA compliance?

22 A. Currently, my role is not directly related to
23 DEA compliance. I oversee all of our licensures for
24 all of our facilities as well as our customers and

1 our vendors.

2 Q. And when you say "licensure," are you
3 referring to a license to distribute controlled
4 substances? Or licensure how?

5 MS. KOSKI: Object to form.

6 THE WITNESS: State licensure, DEA licensure,
7 controlled substance licenses. So I make sure
8 that our customers are licensed appropriately. I
9 make sure our facilities are licensed
10 appropriately, and our vendors.

11 BY MR. STOLTZ:

12 Q. And in that capacity, you're familiar with
13 both federal and state regulations?

14 A. Yes, sir.

15 Q. Okay. If there's ever a question I ask and
16 you don't understand it, feel free to let me know.

17 A. Okay.

18 Q. If you don't tell me that you don't
19 understand, I'm going to assume that you do
20 understand.

21 A. Okay.

22 Q. Have you ever testified in a deposition or at
23 trial?

24 A. No, sir.

1 Q. Okay.

2 MR. STOLTZ: I'd like to show you what should
3 be marked as Exhibit 1.

4 (Anda - Hall Exhibit 1 was marked for
5 identification.)

6 THE WITNESS: This one is for me?

7 MS. KOSKI: Yes. Actually, I didn't get one.
8 We'll figure it out together.

9 BY MR. STOLTZ:

10 Q. And you can take your time reading it, but
11 have you seen this document before?

12 A. No, sir.

13 Q. Okay. Do you see the second paragraph where
14 it says Ms. Schultz is requested to produce on or
15 before January 22nd, 2019, copies of all documents,
16 data, or information reviewed in connection with
17 preparation for this deposition?

18 A. Yes, sir.

19 Q. Did you bring any documents with you in
20 response to this document?

21 MS. KOSKI: You can answer that question.

22 THE WITNESS: No, sir.

23 BY MR. STOLTZ:

24 Q. Did you review any documents prior to this

1 deposition?

2 A. Yes, sir.

3 Q. Were those documents deposition or trial
4 testimony?

5 MS. KOSKI: I'm going to object and instruct
6 you not to answer.

7 You are not entitled to inquire about the
8 documents -- the substance of the documents she
9 reviewed in preparation for the deposition.

10 MR. STOLTZ: Okay.

11 BY MR. STOLTZ:

12 Q. And I apologize if I already asked this, but
13 did you look in your own personal files to find any
14 documents that might be relevant to this litigation
15 prior to this deposition?

16 A. No, sir.

17 Q. Did you meet with your attorneys prior to
18 this deposition?

19 A. Yes, sir.

20 Q. And was that in person or by phone?

21 A. In person.

22 Q. And how many times did you meet with your
23 attorneys?

24 A. One time.

1 Q. And how long was that?

2 A. A few hours.

3 Q. If you had to guess, how many hours?

4 A. Five.

5 Q. Okay. And who was present?

6 A. Katy and James.

7 Q. Did you speak to anyone else prior to this
8 deposition?

9 MS. KOSKI: Object to form.

10 BY MR. STOLTZ:

11 Q. Did you speak to anyone else prior to this
12 deposition in regards to this litigation?

13 MS. KOSKI: Object to form.

14 THE WITNESS: No.

15 BY MR. STOLTZ:

16 Q. You can answer the question.

17 A. No, sir. Sorry.

18 Q. Are you being reimbursed by your employer for
19 your expenses in connection with this deposition?

20 MS. KOSKI: Object to form.

21 THE WITNESS: No, sir.

22 BY MR. STOLTZ:

23 Q. You're not being paid for your time here?

24 MS. KOSKI: Object to form.

1 THE WITNESS: Salary. I'm a salaried
2 employee.

3 BY MR. STOLTZ:

4 Q. Have you ever received compensation from Anda
5 or Allergan as a speaker at an event?

6 MS. KOSKI: Object to form.

7 THE WITNESS: No, sir.

8 BY MR. STOLTZ:

9 Q. I'd like to ask you about your educational
10 background, if you would please briefly describe your
11 educational background after high school.

12 A. I attended Broward College for two years.

13 Q. Okay. And did you graduate from Broward
14 College?

15 A. No, sir.

16 Q. What did you study while you were there?

17 A. I studied general associates.

18 Q. Okay. Would you describe your employment
19 background after Broward College?

20 A. I'm sorry, could you repeat the question?

21 Q. Can you describe your employment background
22 after leaving Broward College?

23 A. I worked for Target for a few years. I moved
24 to Hallmark. And then I went into Anda, and I have

1 been working for Anda for 15 years.

2 Q. Okay. And you started work -- when did you
3 start working for Anda?

4 A. In June of 2004.

5 Q. And what was your position in 2004?

6 A. I started out as a warehouse clerk, and then
7 shortly after that in 2004, I moved into a compliance
8 clerk role.

9 Q. Okay. And what are the duties of a warehouse
10 clerk?

11 A. Picking, packing, shipping, helping with the
12 operations, getting product out the door.

13 Q. Okay. Does that involve actual moving boxes
14 around?

15 A. Yes, sir.

16 Q. Okay. And then you shifted to a compliance
17 clerk. How did the duties of compliance clerk differ
18 from that of warehouse clerk?

19 A. So I started working as a compliance clerk,
20 and my main responsibilities was licensure. So
21 validating our customers' licensure so that they were
22 set up in our systems appropriately enough that they
23 were eligible to order if you were eligible to order.

24 Q. Just, when you say "eligible to order," just

1 eligible to order pharmaceutical products in general?

2 A. Yes, based on their state and DEA licenses.

3 Q. Okay. And how would you validate a

4 customer's licensure?

5 A. So we would go out at that time to the state

6 portal and validate directly through each state.

7 Q. What is a state portal?

8 A. So each state, almost every state has a

9 website that you can go to for validation. So you

10 can go to that website on their board of pharmacy or

11 medical board website and validate to make sure that

12 they are active, that they are a good expiration

13 date, what their address is.

14 Q. And back in 2004, most states had such a

15 portal?

16 A. Yes, sir.

17 Q. What would happen if a state didn't have a

18 portal?

19 A. We would call them. Make a call direct in to

20 the board.

21 Q. The board?

22 A. The individual boards. So board of pharmacy,

23 medical board, depending on whatever -- whatever the

24 customer falls under.

1 Q. Okay. So for pharmacy, that would be the
2 board of pharmacy?

3 A. Yes, sir.

4 Q. Okay. And if it was a doctor, that would be
5 a different board?

6 A. Medical board.

7 Q. Okay. So as a compliance clerk, you would
8 ensure that the licensure for customers of Anda were
9 valid?

10 A. Yes.

11 Q. Was there anything else you would do as a
12 compliance clerk?

13 A. At that time, that was my main
14 responsibilities.

15 Q. Okay. After working as a compliance clerk,
16 what was your position?

17 A. I moved to a senior role, and then, from
18 there, I was a registration analyst.

19 Q. Okay. And just going back to your time as a
20 compliance clerk, you would be working -- were you
21 working in a particular warehouse?

22 MS. KOSKI: Object to form.

23 BY MR. STOLTZ:

24 Q. As a compliance clerk, did you have -- when

1 it came to ensuring licenses for customers of Anda,
2 did you do that for a particular region?

3 A. No.

4 MS. KOSKI: Object to form.

5 THE WITNESS: All of our customers.

6 BY MR. STOLTZ:

7 Q. Okay. Did you -- what was your business
8 address at that time?

9 A. The place that I worked?

10 Q. Yes.

11 A. 2915 Weston Road, Weston, Florida.

12 Q. Okay. So, as a compliance clerk, you were
13 working in the main office, or were you working in
14 the warehouse itself?

15 A. That building houses both, so --

16 Q. Okay.

17 A. -- it's both a warehouse and office.

18 Q. Okay. And then, in 2007, you got -- you
19 changed position to senior compliance coordinator; is
20 that correct?

21 A. Yes, sir.

22 Q. And as a senior compliance coordinator, how
23 did your duties change from being a compliance clerk?

24 A. Took on a few different roles. Managed the

1 pedigree and temperature monitoring in our facility,
2 but continued with licensure.

3 Q. And what was that? Managed the what? You
4 said you managed the temperature monitoring, and what
5 was the second thing?

6 A. Pedigree.

7 Q. Okay. What is pedigree?

8 A. So at one time there was around 30 or so
9 states that had different requirements on pedigrees,
10 so passing pedigree, and Florida was one of those.
11 So for us to pass product to certain wholesalers, we
12 would have to pass pedigree on that product, showing
13 lot and where it came from, who we purchased it from.

14 Q. And were there also requirements for
15 temperature and humidity?

16 A. Yes, sir.

17 Q. Was that state by state?

18 A. State.

19 Q. Okay. Just the state of Florida?

20 A. Yes, sir.

21 Q. Okay. And from there -- let's go back.

22 As senior compliance coordinator, the
23 compliance referred to complying with state
24 regulations as far as pedigree and temperature and

1 humidity?

2 MS. KOSKI: Object to form.

3 It's okay.

4 THE WITNESS: As well as licensure.

5 BY MR. STOLTZ:

6 Q. Okay. As well as licensure. Were there
7 any -- did you manage a team when it came to -- to
8 keeping track of licensure?

9 MS. KOSKI: Object to form.

10 THE WITNESS: Not at that time.

11 BY MR. STOLTZ:

12 Q. Did you know of anyone else who helped in
13 maintaining licensure records?

14 MS. KOSKI: Object to form.

15 THE WITNESS: Can you restate that?

16 MR. STOLTZ: Sure.

17 BY MR. STOLTZ:

18 Q. Were you the only person at Anda that
19 maintained licensure records?

20 A. No, sir.

21 Q. Who else maintained licensure records?

22 A. Specific names?

23 Q. Sure.

24 A. There was the Cynthia Mendoza,

1 Sandra Bautista, and Vivian Harvey.

2 Q. And were they all senior compliance
3 coordinators or --

4 A. I believe only one was.

5 Q. How did you split up maintaining licensure
6 records?

7 A. Mostly it was shift-driven, so I worked a
8 later shift than the other people on the team. So
9 when I came in, we had shifts on e-mails and shifts
10 on opportunities to work.

11 Q. And how did you ensure that the licensures --
12 or, excuse me, the licenses were accurate and
13 up-to-date?

14 MS. KOSKI: Object to form.

15 THE WITNESS: We would go to the individual
16 boards to verify their -- validate their license.

17 BY MR. STOLTZ:

18 Q. And how frequently would you update the
19 licensure records?

20 A. At expiration, depending on when their board
21 expires them, but sometimes throughout on an audit
22 basis.

23 Q. When -- under what circumstances were audits
24 performed?

1 A. Just random audits.

2 Q. Okay. Those audits were completely random?

3 A. Yes, sir.

4 Q. What was your next position at Anda?

5 A. I believe it was registration analyst.

6 Q. And what is a registration analyst?

7 A. At that point, I took on managing our
8 licensure for our facilities, so making sure our
9 three facilities were licensed.

10 Q. When you refer to facility, what are you
11 referring to specifically?

12 A. We have three facilities, entities, and two
13 of them are distribution centers, and one of them is
14 a broker facility.

15 Q. What's a broker facility?

16 A. Sales center.

17 Q. So like a call center?

18 A. Yes, sir.

19 Q. What were your other responsibilities as a
20 registration analyst?

21 A. SOPs, making sure that they were up-to-date,
22 and as well as licensure for our customers. So I
23 never lost that responsibility.

24 Q. And when you refer to SOPs, are you referring

1 to standard operating procedures?

2 A. Yes, sir.

3 Q. And what kind of standard operating
4 procedures did you maintain?

5 A. So we're required as a wholesale distributor
6 to have up-to-date standard operating procedures on
7 all of our distribution activities as well as
8 compliance activities.

9 Q. And who else worked with you in maintaining
10 standard operating procedures with respect to
11 compliance and distribution?

12 MS. KOSKI: Object to form.

13 THE WITNESS: My manager.

14 BY MR. STOLTZ:

15 Q. And who was your manager?

16 A. Michael Cochrane.

17 Q. What is involved in maintaining a standard
18 operating procedure?

19 MS. KOSKI: Object to form.

20 THE WITNESS: Can you be --

21 MR. STOLTZ: Sure.

22 BY MR. STOLTZ:

23 Q. Did you draft the standard operating
24 procedure?

1 A. At that time, no, sir.

2 Q. So what's involved -- what was your
3 responsibilities with respect to the standard
4 operating procedures at that time?

5 A. Maintaining, making sure -- partnering with
6 the respective areas to make sure that they were
7 up-to-date, and grabbing the correct information.

8 Q. Okay. When you say maintaining, does that
9 just mean keep making sure it's not destroyed? What
10 is involved with maintaining a standard operating
11 procedure?

12 A. Reviewing. Making sure that we are reviewing
13 it on an annual basis.

14 Q. What is the purpose of reviewing a standard
15 operating procedure?

16 MS. KOSKI: Object to form.

17 THE WITNESS: We have requirements on a state
18 level to have and house standard operating
19 procedures.

20 BY MR. STOLTZ:

21 Q. And were those requirements -- did those
22 requirements change while you were in that position?

23 MS. KOSKI: Object to form.

24 THE WITNESS: Can you clarify what --

1 MR. STOLTZ: Sure.

2 THE VIDEOGRAPHER: I'm sorry to interrupt.

3 They are saying they can't hear you guys. If you

4 guys can speak up a little louder, just because

5 the webcam has to pick you up, too. I'm sorry.

6 MR. STOLTZ: Okay.

7 MS. KOSKI: No problem. Maybe if I push this

8 up a little higher.

9 BY MR. STOLTZ:

10 Q. So would you agree that the purpose of

11 reviewing the standard operating procedures on an

12 annual basis was to ensure that Anda was in

13 compliance with state and federal regulations?

14 MS. KOSKI: Object to form.

15 THE WITNESS: No, sir.

16 BY MR. STOLTZ:

17 Q. So why were the standard operating procedures

18 reviewed on an annual basis?

19 A. To make sure that Anda was following their

20 own procedures.

21 Q. So how could you ensure that Anda was

22 following its own procedures?

23 A. So when you're reviewing and validating on an

24 annual basis, you are partnering with the person that

1 is actually doing that process and making sure that
2 they are following that, and if anything has changed,
3 then we need to update the document.

4 Q. What are some changes, just for an example?

5 MS. KOSKI: Object to form.

6 Are you asking her to pick any random SOP and
7 give an example of a change?

8 BY MR. STOLTZ:

9 Q. So when it comes to a compliance SOP, for
10 example, you said that you make sure that Anda is
11 following that SOP, and if anything has changed, we
12 need to update the document.

13 What do you -- what do you mean by "anything
14 has changed"? Could that refer to state or federal
15 regulations, or is that referring to other type of
16 changes?

17 MS. KOSKI: Object to form.

18 THE WITNESS: It would be a change
19 internally. So if A plus B is no longer
20 equalling C, we need to make sure we document
21 that.

22 BY MR. STOLTZ:

23 Q. Okay. So can you just give an example of an
24 internal change that would require --

1 A. So, for example, for receiving SOP where a
2 receiving clerk passes a document to a receiving
3 analyst and now that document does not -- no longer
4 goes past the analyst, the receiving clerk manages
5 it, that would be an example of a change.

6 Q. And then from registration analyst, it looks
7 like you became manager of regulatory compliance?

8 A. Yes, sir.

9 Q. How did the position differ from your
10 position as a registration analyst?

11 A. I still managed our licensure for our
12 facility as well as our customers, but now I had some
13 direct reports under me at that point.

14 Q. And who are those people? Who are those
15 district reports?

16 A. The same names that I said earlier: Vivian
17 Harvey, Sandra Bautista, and Cynthia Mendoza.

18 Q. So the only difference as a manager of
19 regulatory compliance was that you had direct
20 reports? Or were there additional responsibilities
21 on top of maintaining accurate licenses for your
22 customers and for Anda?

23 MS. KOSKI: Object to form.

24 ///

1 BY MR. STOLTZ:

2 Q. Did your responsibilities change at all when
3 you became manager of regulatory compliance?

4 A. The core of my responsibilities did not
5 change.

6 Q. Okay. And what is regulatory compliance?

7 A. Making sure that we are monitoring and
8 following state and federal regulations regarding
9 licensure or so on.

10 Q. What's "so on"?

11 A. Federal regulations, changes in the
12 environment.

13 Q. What do you mean by changes in the
14 environment?

15 A. When there's a change in the regulations,
16 monitoring them.

17 Q. When you refer to regulations, are you
18 referring specifically to licensing requirements?

19 A. Yes, sir.

20 Q. At any point in your position as manager of
21 regulatory compliance were you -- were you monitoring
22 for suspicious orders by customers of Anda?

23 A. Yes, sir.

24 MS. KOSKI: Object to form.

1 BY MR. STOLTZ:

2 Q. Is that -- is that separate from maintaining
3 licensure?

4 A. Yes, sir.

5 Q. So in addition to making sure everyone's
6 licenses were up-to-date, you also monitored for
7 suspicious orders?

8 A. Yes, sir.

9 Q. Okay. So was there anything else in
10 regulatory compliance that you would -- are there any
11 other responsibilities other than maintaining
12 licensure and ensuring -- ensuring that there are no
13 suspicious orders delivered by Anda?

14 MS. KOSKI: Object to form.

15 THE WITNESS: I'm not clear.

16 BY MR. STOLTZ:

17 Q. Okay. Sure.

18 What were your responsibilities with regard
19 to monitoring suspicious orders?

20 MS. KOSKI: Object to form.

21 The objection is as to time, if you care.

22 MR. STOLTZ: Sure.

23 BY MR. STOLTZ:

24 Q. At any point before becoming manager of

1 regulatory compliance, would you have been involved
2 in monitoring for suspicious orders?

3 A. No, sir.

4 Q. When you became manager of regulatory
5 compliance, is that when you started to monitor for
6 suspicious orders?

7 A. Yes, sir.

8 Q. Okay. And did you receive any training in
9 what a suspicious order might look like?

10 A. Yes.

11 MS. KOSKI: Object to form.

12 BY MR. STOLTZ:

13 Q. And what type of training was that?

14 A. I received internal training as well as
15 industry training.

16 Q. Okay. The industry training, when did that
17 occur?

18 A. I would say around 2009.

19 Q. Do you recall what organization put on that
20 training?

21 A. Yes, sir.

22 Q. And what was the name of that organization?

23 A. DEA.

24 Q. Okay. Did anyone else come to that training?

1 MS. KOSKI: Object to form.

2 BY MR. STOLTZ:

3 Q. Did anyone else -- any other representatives
4 from Anda -- were any other representatives of Anda
5 in attendance at that training?

6 A. Yes, sir.

7 Q. And who were the individuals?

8 A. Miguel Palma.

9 Q. And what was his position at Anda?

10 A. I don't know his exact title, but he was a
11 manager for controlled substances in the warehouse.

12 Q. And why is it that Anda sent you to learn
13 about suspicious orders in 2009?

14 MS. KOSKI: Object to form.

15 THE WITNESS: To gain some industry
16 knowledge.

17 BY MR. STOLTZ:

18 Q. But that wasn't a part of your -- was that
19 part of your job description in 2009?

20 A. Not specifically attending DEA conferences.

21 Q. Were you monitoring for suspicious orders in
22 2009?

23 A. Not me specifically.

24 Q. Who was?

1 A. I can't say for certain.

2 Q. Would it have been the individual you
3 mentioned? Miguel Palma?

4 A. Miguel Palma? I can't say.

5 Q. So in 2009, Anda sent you and Miguel Palma to
6 learn about monitoring suspicious orders and what
7 suspicious orders looked like.

8 Is that accurate?

9 MS. KOSKI: Object to form.

10 THE WITNESS: No, that's not what I said.

11 BY MR. STOLTZ:

12 Q. Okay. What did you say?

13 MS. KOSKI: Object to form.

14 You can answer.

15 THE WITNESS: I attended a DEA conference.

16 BY MR. STOLTZ:

17 Q. And did Anda send you to that DEA conference?

18 A. Yes, sir.

19 Q. And what was the subject matter?

20 A. There was various different courses.

21 Q. And what were the various different courses?

22 A. Overall, the DEA regulations. There was our
23 goals, 222 forms, talked about quota. Those were the
24 topics I can remember off the top of my head.

1 Q. Do you recall that -- them speaking about
2 suspicious orders?

3 A. I can't recall.

4 Q. So in 2009, you can't recall whether or not
5 the DEA training included references to suspicious
6 orders?

7 A. Correct.

8 Q. They didn't refer to what a suspicious order
9 might look like?

10 A. I don't recall.

11 Q. Okay. What was Miguel Palma's position at
12 Anda?

13 MS. KOSKI: Objection.

14 THE WITNESS: Like I stated before, I don't
15 know his exact title, but he was a manager of
16 controls in the warehouse.

17 BY MR. STOLTZ:

18 Q. And do you recall how long the training was?

19 A. Three days, I believe.

20 Q. Do you remember where it occurred?

21 A. It was in Tampa, Florida.

22 Q. Was it a requirement that Anda send a
23 representative to the industry training?

24 MS. KOSKI: Object to form.

1 THE WITNESS: I do not know.

2 BY MR. STOLTZ:

3 Q. How shortly after becoming a registration
4 analyst did you attend that DEA training?

5 A. I couldn't say for certain.

6 Q. So earlier on in the deposition, you said you
7 received training on what a suspicious order might
8 look like, but then you said that you don't recall
9 whether or not you received training as to what a
10 suspicious order looked like.

11 Did you -- did you recall remembering --
12 excuse me.

13 Did you, in fact, receive training on what a
14 suspicious order looked like, or did you not?

15 MS. KOSKI: Object to form.

16 THE WITNESS: I don't believe that I said
17 that I never received suspicious orders training.

18 BY MR. STOLTZ:

19 Q. In reference to the DEA training in 2009, you
20 said that you had received training as to what a
21 suspicious order looks like. That's the same meeting
22 that -- we're talking about the same meeting?

23 A. No, sir.

24 Q. There are two different industry -- there was

1 two different training sessions in 2009?

2 A. No, sir.

3 Q. So I'm just trying to understand. There was
4 just the one three-day training in Tampa, Florida,
5 that was put on by the DEA?

6 A. In 2009, yes.

7 Q. In 2009?

8 A. I believe it was 2009, yes, sir.

9 Q. And you went to that meeting with Miguel
10 Palma?

11 A. Yes, sir.

12 Q. Okay. And when you said that you received
13 training as to what a suspicious order looks like,
14 what were you referring to?

15 A. Our -- our electronic monitoring is a -- I
16 had -- internal training on that from my manager. It
17 was a leadership training, internal.

18 Q. And that was in addition to the training you
19 received at the DEA training in Tampa?

20 A. Yes, sir.

21 Q. And that training --

22 A. That didn't occur in 2009.

23 Q. Okay. And when did the -- when did the
24 internal training occur?

1 A. That was around 2010.

2 Q. Okay. And was that training formalized, or
3 was that sort of more of an informal mentorship
4 relationship?

5 MS. KOSKI: Object to form.

6 THE WITNESS: Can you clarify?

7 BY MR. STOLTZ:

8 Q. Did you receive formal training in 2010 as to
9 what you referred to as your electronic system?

10 A. Our monitoring system, yes, sir.

11 Q. How long was that training?

12 A. It was ongoing.

13 Q. And who trained you?

14 A. The management of compliance at that time.

15 Q. And who was that individual?

16 A. Michael Cochrane and Patrick Cochrane.

17 Q. And when you say your monitoring system, what
18 was the name of that system?

19 MS. KOSKI: Object to form.

20 THE WITNESS: Our electronic monitoring -- so
21 it was a monitoring system where you were
22 collecting information, due diligence, looking at
23 customers.

24 ///

1 BY MR. STOLTZ:

2 Q. Okay. What -- was there -- how did you refer
3 to that monitoring system internally at Anda?

4 A. A monitoring system.

5 Q. All right. So when did you receive -- you
6 said you received that training on the electronic
7 monitoring system in 2010?

8 A. Yes, sir.

9 Q. Okay. Was -- was that monitoring system --
10 did you use that in your day-to-day -- in your
11 day-to-day responsibilities?

12 MS. KOSKI: Object to form.

13 THE WITNESS: Part of.

14 BY MR. STOLTZ:

15 Q. So when you said you didn't monitor for
16 suspicious orders until 2011, did you mean 2010?

17 MS. KOSKI: Object to form.

18 THE WITNESS: I don't recall saying 2011.

19 BY MR. STOLTZ:

20 Q. So when is it that it was part of your job to
21 monitor for suspicious orders?

22 A. 2010.

23 Q. And that's when you were a registration
24 analyst or when you were manager of regulatory

1 compliance?

2 A. At that time manager of regulatory
3 compliance.

4 Q. So is it fair to say that your main
5 responsibilities as a manager of regulatory
6 compliance were to monitor licensure activities,
7 monitor trends as far as state and federal
8 regulation, and also monitor for suspicious orders?

9 A. Yes, sir.

10 Q. Why does Anda have a regulatory compliance
11 department?

12 MS. KOSKI: Object to form.

13 BY MR. STOLTZ:

14 Q. In your understanding, why does Anda have a
15 regulatory compliance department?

16 A. To make sure that we are following state and
17 federal.

18 Q. State and federal regulations?

19 A. Oh, I'm sorry, yes. I said it in my head.

20 Q. So as manager of regulatory compliance, were
21 you the manager of the entire regulatory department
22 at Anda?

23 A. No, sir.

24 Q. And that was Michael Cochrane?

1 A. Yes, sir.

2 Q. How did your position differ from that of
3 Robert Brown?

4 MS. KOSKI: Object to form.

5 THE WITNESS: Can you please clarify?

6 MR. STOLTZ: Sure.

7 BY MR. STOLTZ:

8 Q. What was Robert Brown's position at Anda?

9 A. He was the, I believe, associate director of
10 DEA compliance. I'm sorry, I don't remember his
11 exact title.

12 Q. Sure.

13 And how did you guys -- how did you and
14 Robert Brown manage the regulatory department? Did
15 your responsibilities differ in any way?

16 MS. KOSKI: Object to form.

17 THE WITNESS: When?

18 MR. STOLTZ: In 2011.

19 THE WITNESS: I'm sorry, I'm not clear what
20 the question is.

21 MR. STOLTZ: Sure.

22 BY MR. STOLTZ:

23 Q. I'm just trying to get an idea of, I guess,
24 the organizational sort of top-down structure of the

1 regulatory department, and it's my understanding that
2 Michael Cochrane was the head of the regulatory
3 department.

4 Is that accurate?

5 A. Yes, sir.

6 Q. And underneath him was yourself and
7 Robert Brown?

8 A. Yes, sir. That was not 2011. That was 2012,
9 Robert Brown came on board.

10 Q. Okay. Do you know why Robert Brown came on
11 board?

12 MS. KOSKI: Object to form.

13 THE WITNESS: I'm not sure.

14 BY MR. STOLTZ:

15 Q. Okay. Did you have different, I guess,
16 direct reports, or did you share direct reports?

17 MS. KOSKI: Object to form.

18 THE WITNESS: I'm not clear on what you're
19 asking me.

20 BY MR. STOLTZ:

21 Q. So you testified earlier that Cynthia Mendoza
22 and other individuals would report to you directly.
23 Were those the same individuals that would report to
24 Robert Brown, or did you have different folks that

1 would report to you?

2 A. There was -- he had a separate team.

3 Q. Okay. What were -- how did the
4 responsibilities of your team differ from the
5 responsibilities of his?

6 A. So my team managed licensure as well as those
7 other few things that we talked about: SOPs,
8 temperature, pedigree. His team managed the DEA.

9 Q. Your team didn't manage -- when you say his
10 team managed DEA, what do you mean?

11 A. DEA compliance.

12 Q. Did your team manage DEA compliance?

13 A. No, sir.

14 Q. Did Sandra Bautista manage DEA compliance?

15 A. No, sir.

16 Q. Cynthia Mendoza, did she?

17 A. No, sir.

18 Q. Did Natasha Jean-Charles manage DEA
19 compliance?

20 A. No, sir.

21 Q. I'm going to show you what is marked as
22 Exhibit 2.

23 (Anda - Hall Exhibit 2 was marked for
24 identification.)

1 MR. STOLTZ: I apologize for the awkward
2 stapling.

3 MS. KOSKI: I think you might have put the
4 sticker on the back.

5 MR. STOLTZ: No, it's just funky. Well, did
6 I? Well, either way.

7 MS. KOSKI: Do you want me to fix the sticker
8 so it's on the front page?

9 MR. STOLTZ: Yes. Thank you.

10 Exhibit 2 is bearing Bates numbers 000570944
11 to 570926.

12 BY MR. STOLTZ:

13 Q. Do you recognize this document?

14 A. No, sir.

15 Q. I'd like to -- you to refer to the page
16 bearing Bates number 570934.

17 MS. VAN TASSELL: Excuse me. This is Rebecca
18 Van Tassell for McKesson.

19 Could you state the prefix for those numbers?

20 MR. STOLTZ: Sure.

21 Anda_Opioids_MDL_000570934.

22 MS. VAN TASSELL: Thank you.

23 MR. STOLTZ: In the future I'll just refer to
24 the prefix in the event that it's not

1 Anda_Opioids_MDL.

2 BY MR. STOLTZ:



4 Q. So when you testified earlier that your
5 direct reports didn't deal with DEA compliance, what
6 did you mean by that?

7 A. They only -- only DEA they at this time
8 touched was DEA's registrations.

9 Q. And DEA registrations refers to DEA licenses?

10 A. Yes, sir.

11 Q. And those -- they in no way ever dealt with
12 suspicious order monitoring?

13 MS. KOSKI: Object to form.

14 BY MR. STOLTZ:

15 Q. Did they -- did they ever, any of your direct
16 reports, have any involvement in suspicious
17 monitoring, or were they only -- were they only
18 dealing with controlled substances as it related to
19 license -- licensure?

20 A. Yes, sir.

21 Q. You mentioned that in 2011 part of your
22 responsibilities included monitoring for suspicious
23 orders. Were you doing that on your own, or did your
24 direct reports also contribute to monitoring for

1 suspicious orders?

2 MS. KOSKI: Object to form.

3 THE WITNESS: No.

4 BY MR. STOLTZ:

5 Q. Let me rephrase the question.

6 You mentioned that in 2011 that part of your
7 responsibilities were monitoring for suspicious
8 orders.

9 Is that accurate?

10 A. Yes, sir.

11 Q. Were any of your direct reports involved with
12 monitoring suspicious orders?

13 A. No, sir.

14 Q. So when their positions refer to senior DEA
15 compliance clerk, the DEA compliance is referring to
16 what?

17 A. It's more of a standard. So you're fitting
18 into a form. A title is fitting into a form, but
19 they did not have any oversight -- just that it's
20 just a title.

21 Q. Sure.

22 Did they have any involvement whatsoever in,
23 I guess, standard operating procedure with regards to
24 monitoring for suspicious orders?

1 A. No, sir.

2 Q. What was your involvement in monitoring for
3 suspicious orders?

4 MS. KOSKI: Object to form.

5 BY MR. STOLTZ:

6 Q. How did you monitor for suspicious orders?

7 MS. KOSKI: Object to form.

8 THE WITNESS: Can you please verify?

9 MR. STOLTZ: Sure.

10 BY MR. STOLTZ:

11 Q. In 2011, part of your responsibilities were
12 monitoring for suspicious orders. What does that
13 mean?

14 A. Doing due diligence on our customers.

15 Q. What type of due diligence?

16 A. Dispensing data -- collecting dispensing
17 data, collecting customer questionnaires, reviewing
18 them, looking at their location and geographics.

19 Q. And did anyone -- did you -- did you do the
20 due diligence?

21 A. Yes, sir.

22 Q. So would you collect dispensing data?

23 A. Yes, sir.

24 Q. And you would collect questionnaires?

1 A. Yes, sir.

2 Q. Would you review the questionnaires?

3 A. Yes, sir.

4 Q. And you would review the location?

5 A. Yes, sir.

6 Q. And the geographics?

7 A. Yes, sir.

8 Q. Did anyone underneath you, specifically

9 Sandra Bautista, Cynthia Mendoza, Natasha

10 Jean-Charles, did they also collect dispensing data?

11 A. No, sir.

12 Q. Would they collect questionnaires?

13 A. No, sir.

14 Q. Would they ever review the questionnaires?

15 A. No, sir. They had no involvement.

16 Q. They had no involvement.

17 So what was -- in what way would you -- I

18 guess --

19 Would you specifically collect the dispensing

20 data?

21 MS. KOSKI: Object to form.

22 BY MR. STOLTZ:

23 Q. Who would collect dispensing data?

24 MS. KOSKI: Object to form.

1 THE WITNESS: Can you please clarify?

2 MS. KOSKI: You're asking a name of a person?

3 MR. STOLTZ: I'm trying to understand if she
4 was out collecting dispensing data or if someone
5 was sending the dispensing data to her.

6 THE WITNESS: Requesting it from our
7 customers.

8 BY MR. STOLTZ:

9 Q. Okay. You would directly request the data
10 from customers?

11 A. Myself or a field sales representative.

12 Q. Okay. And when it came to, say, like a
13 national chain, how would you go about requesting
14 dispensing data?

15 A. Request it from the sales rep.

16 Q. Okay. Who would be -- was -- wouldn't -- who
17 was in charge of -- who was the point of contact for
18 retail chain pharmacies?

19 MS. KOSKI: Object to form.

20 THE WITNESS: Can you please clarify?

21 BY MR. STOLTZ:

22 Q. You mentioned a sales rep would collect the
23 dispensing data when you needed it for a customer.

24 What type of customers did Anda have?

1 A. Retail pharmacies, hospice, long-term care
2 pharmacies, closed-door, just to name a few.

3 Q. And does that also include, like, smaller
4 individually owned pharmacies?

5 A. Yes, sir.

6 Q. Were the sales reps -- who were the sales
7 reps for the national retail chains? Were those the
8 same folks that would be sales reps for individual
9 pharmacies?

10 MS. KOSKI: Object to form.

11 THE WITNESS: No, sir.

12 BY MR. STOLTZ:

13 Q. Okay. Were they in a different department?

14 A. Yes, sir.

15 Q. When you said dispensing data, what does that
16 mean?

17 A. Dispensing data is a format that can be
18 pulled from a pharmacy showing what they have done in
19 an X amount of time frame.

20 Q. What they have done as far as?

21 A. Dispensed.

22 Q. Okay. And did -- what was the purpose of
23 asking for dispensing data?

24 MS. KOSKI: Object to form.

1 BY MR. STOLTZ:

2 Q. Why did you ask for dispensing data?

3 A. To see the big picture of the pharmacy.

4 Q. And why did you need to see the big picture
5 of the pharmacy?

6 A. To understand if it's a pharmacy that we
7 choose to do business with.

8 Q. What are some reasons why you would choose
9 not to do business with a pharmacy?

10 MS. KOSKI: Object to form.

11 BY MR. STOLTZ:

12 Q. Whose -- whose decision was it to -- who
13 decided whether or not Anda wanted to do business
14 with a pharmacy?

15 A. The compliance department.

16 Q. Was that your department?

17 A. Yes, sir.

18 Q. Did you decide whether or not a particular
19 pharmacy was a pharmacy that Anda wanted to do
20 business with?

21 MS. KOSKI: Object to form.

22 THE WITNESS: Can you please clarify?

23 BY MR. STOLTZ:

24 Q. In your position as the manager of regulatory

1 compliance, was it part of your job responsibilities
2 to decide whether or not a particular pharmacy was a
3 pharmacy that Anda wanted to do business with?

4 A. Yes, sir.

5 Q. What are some of the factors involved in that
6 decision?

7 A. Reviewing a customer's due diligence -- I
8 mean, excuse me.

9 Reviewing the due diligence of a customer,
10 including dispensing data, customer questionnaires,
11 the geographics.

12 Q. And did you ever decide a particular pharmacy
13 was not a pharmacy that Anda wanted to do business
14 with?

15 MS. KOSKI: Object to form.

16 THE WITNESS: Can you please clarify?

17 BY MR. STOLTZ:

18 Q. Was there ever a time when you decided that a
19 particular customer of Anda was not a pharmacy that
20 Anda wanted to do business with?

21 A. Yes, sir.

22 Q. Do you remember any of those occasions?

23 A. Not specifically.

24 Q. Can you think of an example?

1 A. No, sir.

2 Q. Why -- do you recall -- why would Anda not
3 want to do business with a particular pharmacy based
4 on due diligence?

5 MS. KOSKI: Object to form.

6 THE WITNESS: Can you please clarify?

7 BY MR. STOLTZ:

8 Q. You referenced looking at the particular
9 factors when deciding whether or not a customer was a
10 customer that Anda wanted, and that included
11 dispensing data, the contents of a customer
12 questionnaire, and/or the geographics.

13 When it comes to dispensing data, what type
14 of dispensing data would indicate that a customer was
15 not a customer that Anda wanted to do business with?

16 A. Top products, opioids on the top products,
17 bad mix, not a good -- not a good variety.

18 Q. What is a bad mix?

19 A. Not a good variety of products.

20 Q. Were those the only factors?

21 A. Part of it.

22 Q. Were there other factors?

23 A. That's all I can think of right now.

24 Q. So dispensing data would reveal whether or

1 not opioids or controlled substances were a large
2 portion of that pharmacy's business?

3 A. Yes, sir.

4 Q. And if -- and if a pharmacy's business --
5 if -- excuse me.

6 If the proportion of a pharmacy's business --
7 or excuse me.

8 If a large proportion of a pharmacy's
9 dispensed drugs were controlled substances, that
10 would be a factor in deciding whether or not Anda
11 wanted to do business with them?

12 A. Part of the decision, yes.

13 Q. Do you recall what proportion would make you
14 not take them as a customer?

15 MS. KOSKI: Object to form.

16 BY MR. STOLTZ:

17 Q. What portion of -- how much opioids compared
18 to their other products dispensed would a pharmacy
19 have to dispense in order for Anda not to want to do
20 business with?

21 A. There's no set number. It varies on each
22 situation specific to that pharmacy or customer.

23 Q. What type of situations would justify a
24 relatively large portion of opioids compared to other

1 products dispensed?

2 A. Depending on where they are located. Like I
3 said before, how their questionnaire, what shows on
4 the questionnaire, their geographics, what is their
5 type of business.

6 Q. So a retail -- would that standard ever get
7 applied differently depending on whether or not a
8 pharmacy was a large chain or whether it was an
9 individual pharmacy?

10 A. No, sir.

11 Q. But you did mention that that was a
12 subjective determination, right?

13 MS. KOSKI: Object to form.

14 THE WITNESS: I'm not clear.

15 BY MR. STOLTZ:

16 Q. So when it came to reviewing due diligence,
17 specifically dispensing data, there were situations
18 in which a relatively large -- a pharmacy that was
19 dispensing a relatively large amount of opioids
20 compared to other drugs dispensed, there would be
21 reasons why that would be justified?

22 MS. KOSKI: Object to form.

23 THE WITNESS: I don't have specifics in front
24 of me. I would have to --

1 BY MR. STOLTZ:

2 Q. Well, hypothetically, as manager of the
3 regulatory department, what are the types of
4 instances that would justify a pharmacy dispensing a
5 large amount of opioids compared to other products?

6 A. I'm sorry, I wouldn't be able to say. It's
7 more of a big picture.

8 Q. Okay. Big picture, so --

9 MS. KOSKI: Object to form.

10 BY MR. STOLTZ:

11 Q. So looking at the big picture, what are some
12 instances in which a large amount of opioids
13 dispensed compared to other products, looking at the
14 big picture, what are some just general reasons why
15 that wouldn't be alarming for Anda?

16 MS. KOSKI: Object to form.

17 THE WITNESS: Can you please clarify?

18 MR. STOLTZ: Sure.

19 BY MR. STOLTZ:

20 Q. When a pharmacy is dispensing a large amount
21 of opioids compared to other products dispensed, that
22 wouldn't necessarily mean that a -- that it was a
23 customer that Anda didn't want to do business with,
24 right?

1 MS. KOSKI: Object to form.

2 THE WITNESS: Correct.

3 BY MR. STOLTZ:

4 Q. And what are some of the factors in deciding
5 whether or not -- all right.

6 So let's say there's Pharmacy A and B, and
7 both of them -- 50 percent of the products that both
8 of them dispense are opioids. Or less. Let's say
9 20 percent.

10 Are there instances in which one pharmacy
11 could be -- are there instances in which Anda would
12 not want to do business with one as opposed to the
13 other?

14 A. So depending on geographics, their
15 speciality, also who -- who's their primary,
16 understanding, like I said, the bigger picture of the
17 customer. Dispensing data is not like the end-all.
18 It's like a bigger picture of all the facts.

19 Q. Sure.

20 When you said who's their primary, what does
21 that mean?

22 A. Their primary wholesaler.

23 Q. And how would knowing who their primary
24 wholesaler affect the determination?

1 A. Well, it's an understanding, because Anda is
2 a secondary, so -- we're a secondary wholesaler.
3 Understanding who is their primary relationship with.

4 Q. How would that matter?

5 A. It's knowing your customer, understanding who
6 they are, who they do business with.

7 Q. So how would -- how would who their primary
8 distributor -- how would knowing who their primary
9 distributor affects that determination?

10 MS. KOSKI: Object to form.

11 BY MR. STOLTZ:

12 Q. Why does knowing who their primary
13 distributor matter when it comes to dispensing
14 controlled substances to a customer of Anda?

15 A. It's not specific. It's more of
16 understanding who they are and what they're -- who
17 they are doing business with overall.

18 Q. Right.

19 A. And understanding who that business core is.

20 Q. So part of due diligence is collecting data
21 on a customer, right?

22 A. Yes, sir.

23 Q. And the purpose of having that data is to
24 determine whether or not that customer is a customer

1 that Anda wants?

2 A. Yes, sir.

3 Q. How is knowing who their primary
4 distributor -- how does that help Anda or yourself as
5 the manager of regulatory compliance, how does that
6 help you determine whether or not a customer is a
7 customer you want to keep as opposed to refuse to
8 dispense controlled substances to them, for example?

9 A. So understanding if they have more than one
10 primary, if they have other secondaries,
11 understanding where we fit in their big picture of
12 their business.

13 Q. Is it a situations where a pharmacy would
14 have more than one primary?

15 A. Possibly.

16 Q. If a customer were to have more than one
17 primary, how would that affect Anda's decision to
18 continue to dispense controlled substances to that
19 customer?

20 MS. KOSKI: Object to form.

21 THE WITNESS: Can you please clarify?

22 MR. STOLTZ: Sure.

23 BY MR. STOLTZ:

24 Q. You mentioned that it would be important to

1 understand whether or not a pharmacy had more than
2 one primary, if there are other secondaries, just so
3 Anda could understand where it fit as far as
4 dispensing controlled substances to that customer.

5 Why was it important to know where Anda fit
6 as far as dispensing controlled substances to a
7 particular customer?

8 A. To understand who they are or who they are
9 doing business with and where we fall in that -- in
10 that picture.

11 Q. Right, I understand that, that you want to
12 know who they are and who they are doing business
13 with. But -- and that's why you asked those
14 questions.

15 But why is it important to know who they are
16 and who they are doing business with?

17 A. So that we know who our customers are.

18 Q. What other factors were involved in knowing
19 who your customer is other than who else is selling
20 to them?

21 A. Dispensing data, questionnaire, geographics.

22 Q. Was it important to know who a primary
23 distributor was in order to -- would you ever contact
24 the primary distributor?

1 A. Not me specifically.

2 Q. Would someone at Anda ever contact a primary
3 distributor?

4 A. I don't know.

5 Q. What is a secondary distributor?

6 A. We're filling out-of-stocks. When a primary
7 is out of stock and we have the product, we fulfill
8 the orders for them.

9 Q. Did you ever follow up with a primary
10 distributor to figure out why they were out of stock?

11 MS. KOSKI: Object to form.

12 THE WITNESS: Not me specifically.

13 BY MR. STOLTZ:

14 Q. But someone at Anda would do that?

15 A. I can't say for certain.

16 Q. Why is it important to know your customer?

17 MS. KOSKI: Object to form.

18 BY MR. STOLTZ:

19 Q. As part of regulatory compliance, what does
20 knowing your customer have to do with regulatory
21 compliance?

22 A. Providing a bigger picture on if we want to
23 do business with a specific customer or not.

24 Q. What does -- how does deciding whether or not

1 you want to do business with a specific customer or
2 not, how does that relate to regulatory compliance?

3 A. I'm not clear.

4 Q. Why would the regulatory compliance
5 department be making decisions as to who Anda wants
6 to do business with?

7 A. Licensing requirements.

8 Q. Any other requirements?

9 A. I'm sorry, I'm not clear.

10 Q. Was knowing your customer part of ensuring
11 that Anda did not ship suspicious orders?

12 MS. KOSKI: Object to form.

13 THE WITNESS: I'm still not clear. I'm
14 sorry.

15 BY MR. STOLTZ:

16 Q. You said knowing your customer is important
17 to the regulatory compliance department because of
18 licensing requirements, correct?

19 A. Yes, sir.

20 Q. So isn't checking licensing requirements --
21 doesn't that just require going to the state portal
22 and making sure everything is up-to-date?

23 A. Sure, yes. That was part of my
24 responsibilities.

1 Q. So understanding whether or not a pharmacy is
2 licensed to order controlled substances would not
3 require knowing what their dispensing data looked
4 like?

5 A. I'm sorry, I'm not clear.

6 Q. So part of knowing your customer is
7 understanding their dispensing data, having them
8 answer questionnaires, geographics, understanding who
9 their primary distributor is, whether Anda is the
10 secondary distributor, if there are other secondary
11 distributors, other primary distributors.

12 How does any of that relate to licensure?

13 A. I'm sorry, I thought we were talking about my
14 responsibilities.

15 So I'm not clear.

16 Q. We're talking about why Anda would ask
17 certain questions or why the regulatory department
18 was in charge of knowing a customer. You mentioned
19 that knowing the customer is important for licensing
20 requirements.

21 I'm asking why it is that things like
22 geographics, who the primary supplier is, dispensing
23 data, what or how does any of that have to do with
24 licensing requirements?

1 A. DEA requirements. I'm sorry. I didn't
2 understand what your question was.

3 Q. Okay. What are those DEA requirements?

4 A. Knowing your customer.

5 Q. And why was it important to know your
6 customer?

7 A. To understand the big picture of the
8 customer, what they're doing, what their speciality
9 is, who they're -- who they are doing business with.

10 Q. And it's your understanding that it's a DEA
11 regulation to understand the big picture of the
12 customer, including what they are doing, what their
13 speciality is, and who they are doing business with?

14 MS. KOSKI: Object to form.

15 You can answer.

16 THE WITNESS: Knowing your customer, and
17 knowing is being part of it.

18 BY MR. STOLTZ:

19 Q. So knowing your customer is a DEA
20 requirement?

21 MS. KOSKI: Object to form.

22 BY MR. STOLTZ:

23 Q. DEA regulation?

24 MS. KOSKI: Object to form.

1 You are asking her what the lot is?

2 MR. STOLTZ: No. I'm asking her why the
3 DEA -- excuse me -- the manager of regulatory
4 compliance and the folks -- the DEA compliance
5 managers were concerned with knowing their
6 customer and if that was part of their
7 understanding as far as complying with DEA
8 requirements.

9 MS. KOSKI: You can answer.

10 THE WITNESS: Yes, sir.

11 BY MR. STOLTZ:

12 Q. And that related to monitoring suspicious
13 orders as well?

14 A. Yes, sir.

15 Q. How could knowing your customer help you
16 monitor suspicious orders?

17 A. So if an order is only suspicious with a big
18 picture, looking at -- excuse me, is not suspicious
19 when you look at the big picture of a customer, and
20 all those other things with knowing your customer
21 plays a role in that.

22 Q. So how would knowing who a primary
23 distributor is relate to a determination as to
24 whether an order is suspicious or not?

1 A. Not a determination. Just a factor.

2 Q. How is it a factor?

3 A. Just one part of the puzzle. If we are the
4 secondary, who is their primary? Just -- just an
5 understanding of who the customer is. It's just one
6 factor of the big picture.

7 Q. And how would that factor -- how could that
8 factor influence a determination?

9 I'm just trying to understand how it's
10 relevant who the primary distributor is in
11 determining whether an order is suspicious or not.

12 A. Like I said, that is only one factor. So
13 it's just one field of --

14 Q. Of course.

15 A. -- of review.

16 Q. But each one of those factors is part of a
17 determination as to whether an order is suspicious or
18 not.

19 Is that accurate?

20 A. Yes, sir.

21 Q. So then how does the primary distributor
22 factor into that determination?

23 A. I don't know.

24 Q. Don't you make the decisions as to whether or

1 not a customer is one that Anda wants to do business
2 with?

3 A. At that time, yes.

4 Q. So how would who the primary distributor is
5 factor into your decision?

6 A. I don't know.

7 Q. How would geographics factor into your
8 decision?

9 A. Understanding how many people are in that
10 area, how many different pharmacies are in that area,
11 just getting a better under -- a better view of
12 what's happening in that location.

13 Q. And how would dispensing data factor into
14 that decision?

15 A. Understanding what they're dispensing.

16 Q. And that would include understanding the
17 portion of their dispensed drugs that were controlled
18 substances?

19 A. Yes.

20 Q. Were there any other things you would look
21 for in dispensing data to determine whether or not an
22 order was suspicious?

23 MS. KOSKI: Object to form.

24 THE WITNESS: Could you please clarify?

1 MR. STOLTZ: Sure.

2 BY MR. STOLTZ:

3 Q. You testified earlier that the purpose of
4 asking for dispensing data was to better understand
5 what portion of that pharmacy's business related to
6 dispensing opioid products compared to the other
7 products they dispensed.

8 Were there any other reasons why you asked
9 for dispensing data other than for understanding that
10 proportional relationship?

11 A. Yes. Knowing your customer, yes.

12 Q. So just knowing how much they dispensed in
13 general?

14 A. Overall. So noncontrols as well. Just what
15 is their mix, what are they doing, how much is going
16 out in a specific time frame.

17 Q. Okay. And typically, how -- as a secondary
18 distributor -- as a secondary distributor, did you
19 ask for -- how did you have dispensing data for a
20 pharmacy?

21 MS. KOSKI: Object to form.

22 THE WITNESS: Can you clarify?

23 BY MR. STOLTZ:

24 Q. How did you collect dispensing data for

1 Anda's customers?

2 A. Request it. So we either compliance or sales
3 representative requested it.

4 Q. Okay. And they would provide to you their
5 full dispensing data over a period of time?

6 A. Yes, sir.

7 Q. Typically what -- what period of time did you
8 ask for?

9 A. I believe it was three months at the time.

10 Q. Three months?

11 And was it always three months?

12 A. I can't be certain.

13 Q. When -- when do you remember that it was
14 three months for sure?

15 A. I believe it was 2011, 2012.

16 Q. Three months of dispensing data?

17 A. I believe so.

18 Q. Was that usually like the previous three
19 months?

20 A. Yes, sir.

21 Q. Okay. In your position as the manager of
22 regulatory compliance, if Anda got a new customer or
23 if there was a customer that had previously ordered
24 controlled substances, how would you determine

1 whether or not to supply controlled substances to
2 that pharmacy?

3 MS. KOSKI: Object to form.

4 THE WITNESS: Can you clarify?

5 MR. STOLTZ: Sure.

6 BY MR. STOLTZ:

7 Q. Did regulatory compliance -- did the
8 regulatory compliance department ever make a
9 determination as to whether -- excuse me.

10 Was it part of Anda's standard operating
11 procedure to collect -- to know your customer prior
12 to ever dispensing controlled substances to a
13 customer?

14 MS. KOSKI: Object to form.

15 THE WITNESS: Can you please clarify?

16 BY MR. STOLTZ:

17 Q. At what point did -- excuse me.

18 If a pharmacy contacted Anda and had not
19 previously ordered controlled substances from Anda or
20 had never previously ordered any substances from
21 Anda, would that customer be able to buy controlled
22 substances from Anda?

23 MS. KOSKI: Object to form.

24 THE WITNESS: No, sir.

1 BY MR. STOLTZ:

2 Q. If that customer wanted to buy controlled
3 substances from Anda, how would they go about doing
4 that?

5 A. They would request -- the sales rep or
6 compliance would request for a customer questionnaire
7 and dispensing data to be filled out for review.

8 Q. And who would review that?

9 MS. KOSKI: Object to form.

10 BY MR. STOLTZ:

11 Q. Would you review the customer questionnaire
12 and dispensing data?

13 A. Yes, sir.

14 Q. And based on that, you would decide whether
15 or not to supply controlled substances to that
16 customer?

17 A. Yes, sir.

18 Q. Would you -- after you decided to supply
19 controlled substances to a customer, were they
20 limited in the amount of controlled substances they
21 could order from Anda?

22 A. Yes, sir.

23 Q. And what was that limit?

24 MS. KOSKI: Object to form.

1 THE WITNESS: It would vary.

2 BY MR. STOLTZ:

3 Q. What would it vary on?

4 A. So the basic -- base -- excuse me -- base
5 limits would be a thousand -- set at a thousand. If
6 they were approved and they had just gone through the
7 approval process and were approved, in fact,
8 approved, they would get a base of a thousand -- a
9 thousand units for each family, minus oxycodone and
10 methadone.

11 Q. So oxycodone and methadone wouldn't factor
12 into the thousand units?

13 A. No, sir.

14 Q. How much oxycodone or methadone could they
15 order?

16 A. Zero.

17 Q. Zero.

18 So after a new customer came to Anda and they
19 wanted to order controlled substances, they would be
20 allowed a thousand units for each family but that
21 wouldn't include methadone and oxycodone? They
22 wouldn't be able to order that?

23 A. Yes, sir.

24 Q. What would they have to do to order oxycodone

1 or methadone?

2 A. They would have to do a specific request
3 requesting those products. Those were not just
4 given.

5 Q. Okay. And do you know why oxycodone and
6 methadone weren't included in the thousand-unit
7 limit?

8 A. To have more security, basically, on those
9 specific products and a tighter understanding of
10 who's purchasing them from us.

11 MS. KOSKI: Someone on the phone, can you
12 mute? We can hear a lot of paper shuffles.

13 Thank you.

14 BY MR. STOLTZ:

15 Q. Were oxycodone or methadone treated
16 differently with respect to DEA regulations than
17 other controlled substances?

18 MS. KOSKI: Object to form.

19 BY MR. STOLTZ:

20 Q. Are oxycodone or methadone, are they
21 Controlled II substances?

22 A. Yes, sir.

23 Q. Why did Anda treat them differently than
24 other Controlled II substances?

1 A. Higher abuse rate for those two specific
2 products.

3 Q. When did oxycodone or methadone start being
4 treated differently by Anda?

5 A. I believe from my knowledge it was around
6 that time, 2011-ish time -- 2010. Excuse me, 2010 to
7 2011, sorry.

8 Q. And who made that decision? Do you recall?

9 A. Compliance management.

10 Q. Would that have been you?

11 A. Michael Cochrane.

12 Q. Was there ever a time where other drugs were
13 treated differently, other controlled substances were
14 treated different than others, specifically opioids?

15 MS. KOSKI: Object to form.

16 THE WITNESS? Can you please clarify?

17 MR. STOLTZ: Sure.

18 BY MR. STOLTZ:

19 Q. Starting around 2011-ish time, we know that
20 oxycodone and methadone were not included in the
21 initial thousand-unit limit.

22 Was there ever a time after 2011 where more
23 Controlled II substances or Controlled III substances
24 were added to that list of oxycodone and methadone

1 as -- as more prone to abuse?

2 A. I don't know the exact year but compliance
3 management made restrictions on fentanyl as well.

4 Q. And was that the same restriction, just that
5 it wouldn't be included in the initial thousand?

6 A. Yes, sir.

7 Q. Do you know if Controlled III opioids were
8 subject to the thousand -- thousand-unit limit?

9 A. Controlled II. Opioids are in Schedule II.

10 Q. Sure.

11 Before drugs like hydrocodone or other
12 combination products were Controlled II -- excuse me.

13 When you say family, a thousand units per
14 product family, what is a family?

15 A. A chemical family.

16 Q. Okay. And when hydrocodone products were
17 Schedule III, was that part of the opioid chemical
18 family?

19 A. That was before my time.

20 Q. Do you recall when hydrocodone products were
21 Schedule III?

22 A. Prior to 2010.

23 Q. So can you just sort of take me through the
24 process of -- I don't know how you would refer to

1 it -- take me through the process of, you know, when
2 an initial customer comes to Anda, how the -- how
3 it's decided whether or not that customer is eligible
4 to order controlled substances.

5 Was there a standard operating procedure with
6 respect to that process?

7 A. Yes, sir.

8 Q. What was it?

9 A. The review of the dispensing data -- well,
10 requesting, right. So once it's requested and we
11 received it, it's a review of dispensing data,
12 questionnaire; like I had said before, the
13 geographics.

14 Q. And all of that data was collected prior to
15 allowing a customer to order controls?

16 A. Yes, sir.

17 Q. Was that always the case?

18 MS. KOSKI: Object to form.

19 THE WITNESS: Can you please clarify?

20 BY MR. STOLTZ:

21 Q. Before allowing a customer to order controls,
22 they were required to send in the dispensing data and
23 answer questionnaires.

24 What else were they required to send in?

1 A. Dispensing data, questionnaires, and in some
2 cases we would request for pictures.

3 Q. Pictures of what?

4 A. Of the pharmacy.

5 Q. Why are pictures of the pharmacy relevant?

6 A. To understand the location, see how -- what
7 it looked like on the inside if we couldn't retrieve
8 them online.

9 Q. Okay. Would you ever do a site visit?

10 A. No, sir, not me specifically.

11 Q. Would someone in one of your direct contacts
12 do site visits?

13 MS. KOSKI: Object to form.

14 BY MR. STOLTZ:

15 Q. Or, excuse me, direct reports?

16 A. Direct report, no, sir.

17 Q. Who would go on site visits?

18 A. There has been compliance leadership that has
19 gone on site visits.

20 Q. And why -- why were -- why only sometimes
21 would site visits be conducted?

22 MS. KOSKI: Object to form.

23 THE WITNESS: I don't know.

24 ///

1 BY MR. STOLTZ:

2 Q. Okay. Was there ever an instance where
3 customers were allowed to buy controlled substances
4 while you were the manager of regulatory compliance
5 prior to providing questionnaires, diligence reports,
6 or dispensing data?

7 MS. KOSKI: Object to form.

8 THE WITNESS: Not that I'm aware of.

9 BY MR. STOLTZ:

10 Q. What was EPIC?

11 A. EPIC is a buying group.

12 Q. What is a buying group?

13 A. They are a group of -- specifically, that's a
14 group of pharmacies that get together and have a
15 special pricing plan for going through this EPIC
16 group.

17 Q. So would those mostly be individual, small
18 pharmacies?

19 A. Yes, sir.

20 Q. So they would sort of band together in order
21 to get better prices?

22 A. Yes, sir.

23 Q. Is it kind of like a buyer's club?

24 MS. KOSKI: Object to form.

1 THE WITNESS: I don't know.

2 BY MR. STOLTZ:

3 Q. Like the movie Dallas Buyers Club? Matthew
4 McConaughey?

5 All right.

6 A. I do like Matthew McConaughey, though.

7 Q. Sure.

8 How many stores in EPIC?

9 A. Oh, I don't know.

10 Q. But it could be more than 50?

11 A. I'm sorry, I do not have that answer.

12 Q. What about IPA NJ? Was that also a buyers
13 group?

14 A. I believe so, but I don't have specifics on
15 them.

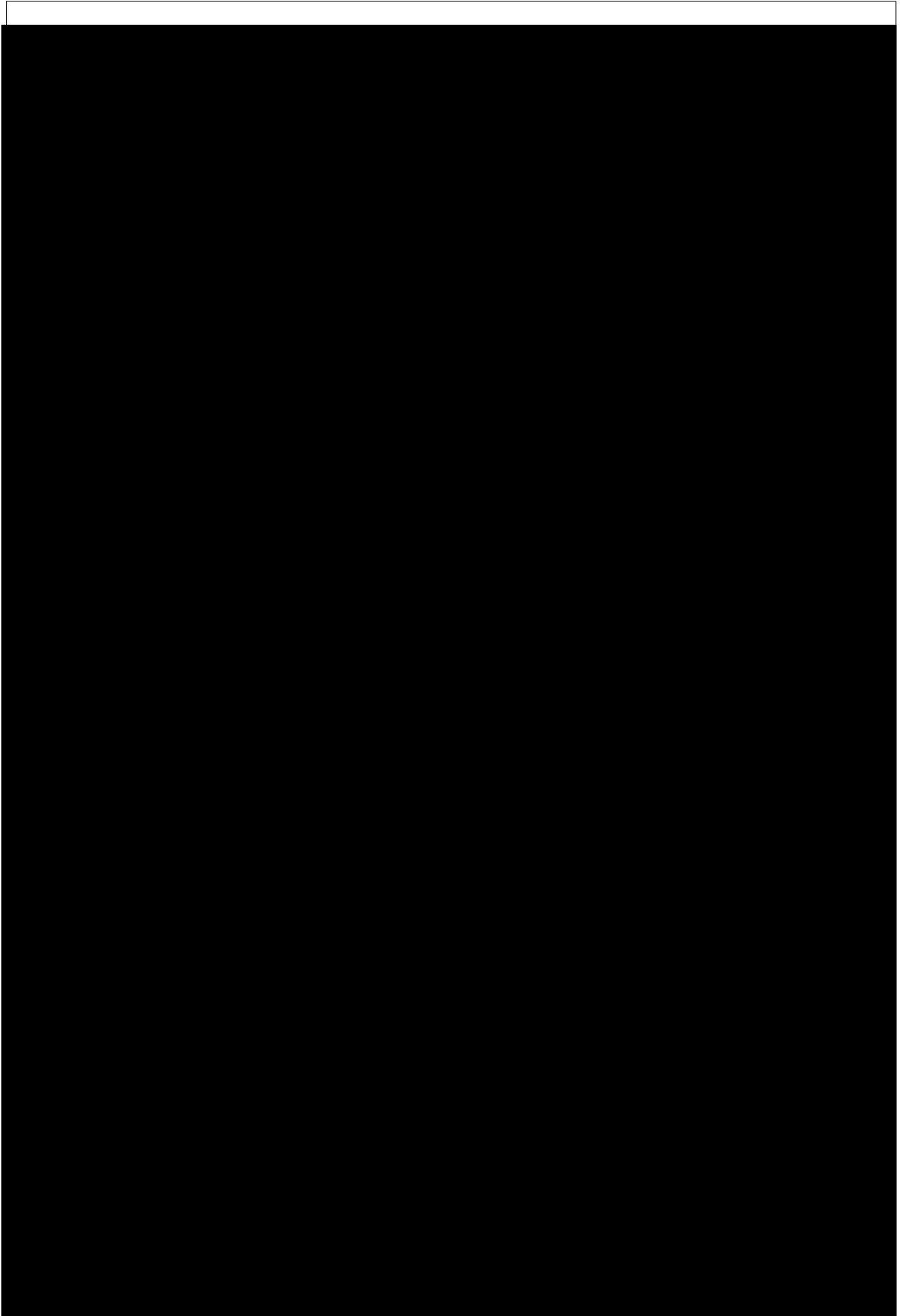
16 Q. I'm going to show you what's been marked as
17 Exhibit 3.

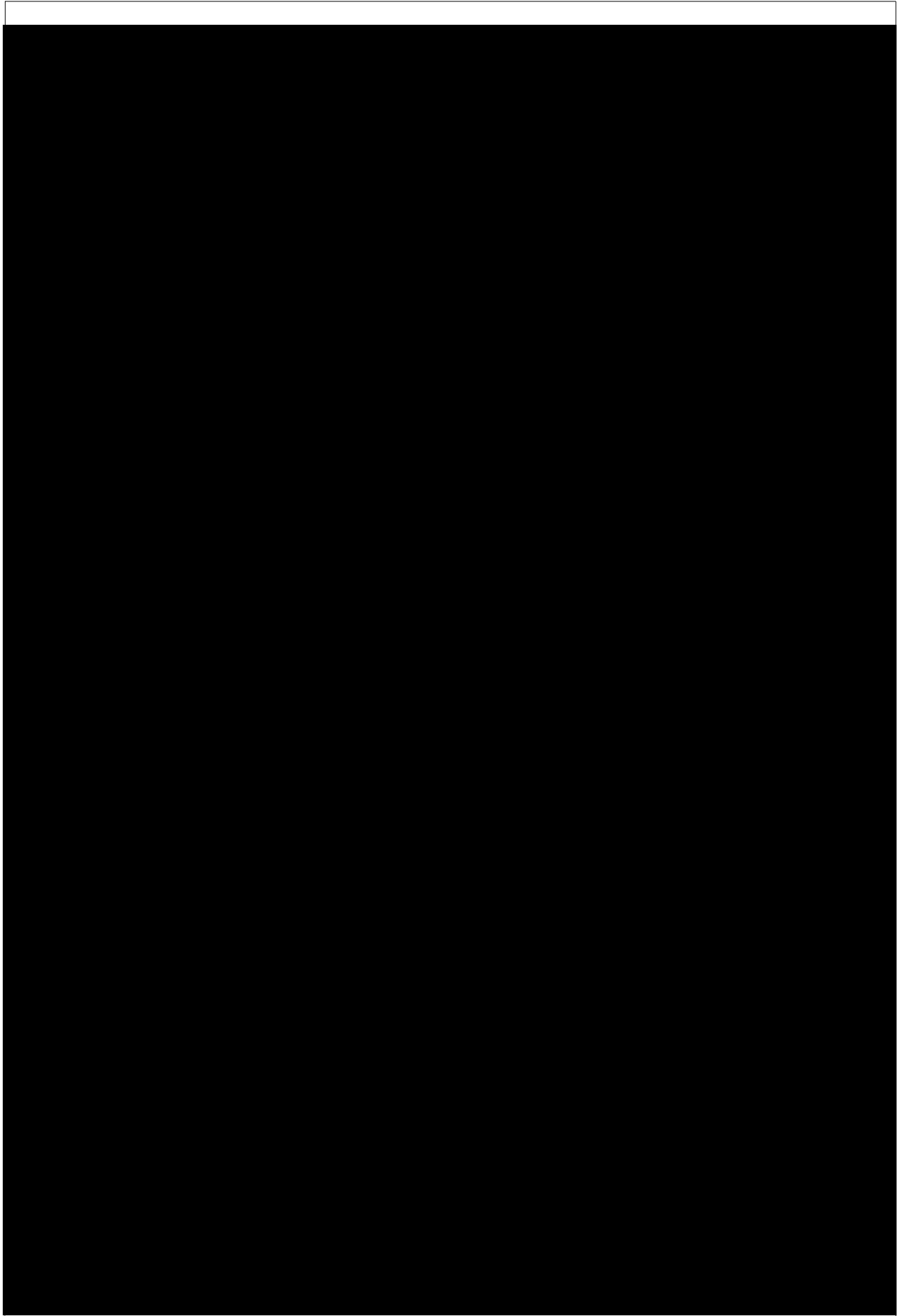
18 (Anda - Hall Exhibit 3 was marked for
19 identification.)

20 MR. STOLTZ: Bearing Bates Number 711634.

21 THE WITNESS: Thank you.

22 BY MR. STOLTZ:





12 Q. So earlier you said it was important to get
13 dispensing data, questionnaires, geographics on a
14 customer in order to determine whether or not they
15 were eligible to purchase controls from Anda.

16 Is that accurate?

17 A. Yes, sir.

18 Q. So were there instances where customers were
19 able to buy a high volume of controls prior to
20 providing the necessary information to regulatory
21 compliance?

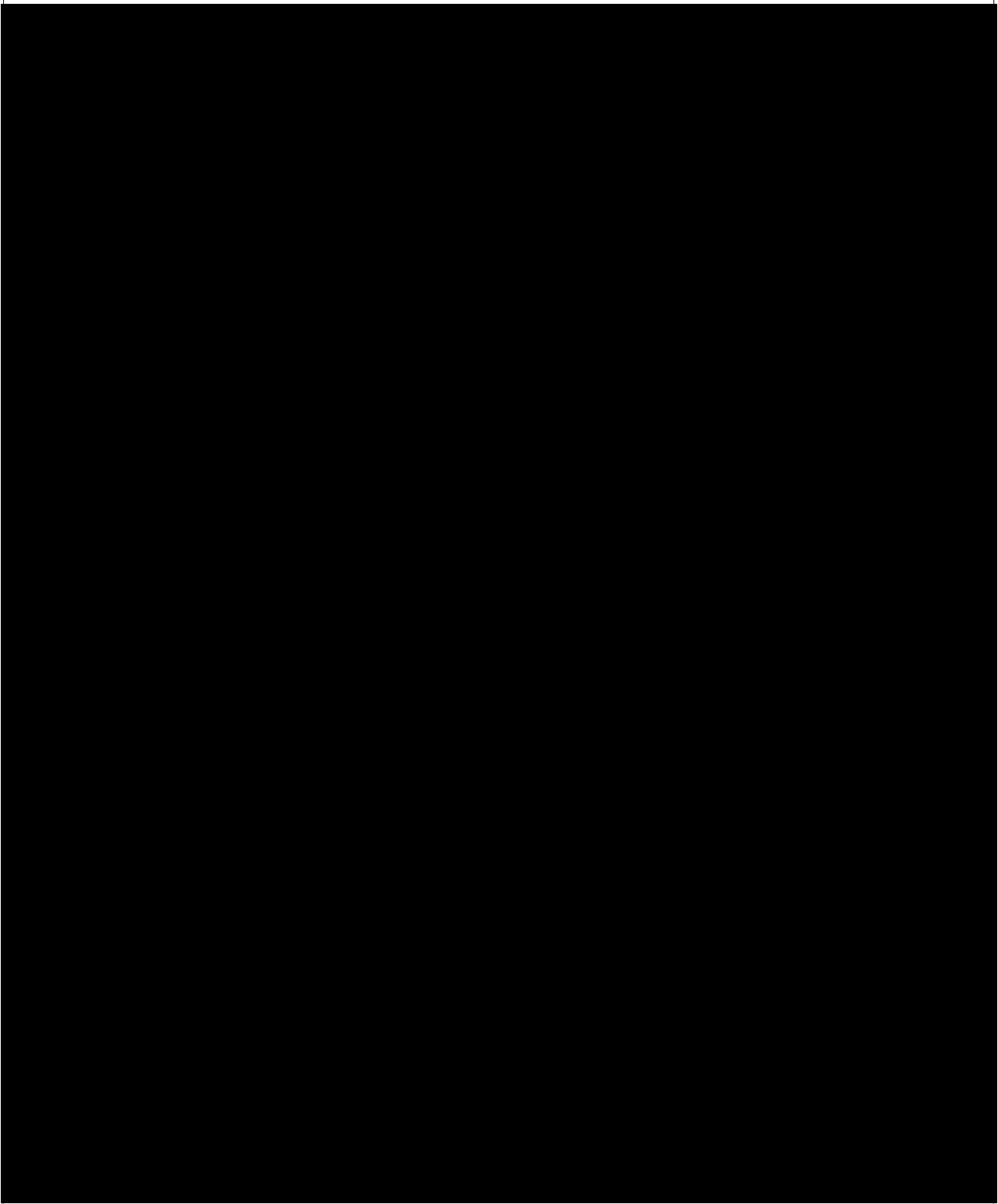
22 MS. KOSKI: Object to form; asked and
23 answered.

24 You can answer.

1 BY MR. STOLTZ:

2 Q. Were buying groups treated differently by
3 regulatory compliance than individual pharmacies?

4 A. No, sir.



12 Q. Was it no longer your responsibility to know
13 your customer and monitor for suspicious orders after
14 2015 -- or after 2012?

15 A. Mine specifically, yes.

16 Q. When did that responsibility change?

17 A. Robert Brown -- when Robert Brown was
18 onboarded, he had some training time, and then he
19 took over that area.

20 Q. Why were you included on this e-mail?

21 A. Just maybe an FYI. I can't say for certain.

22 Q. So after Robert Brown was hired, you had no
23 involvement in monitoring suspicious orders or
24 collecting dispensing data or other factors or

1 deciding -- excuse me.

2 After Robert Brown was hired, did you have --
3 did you review dispensing data?

4 MS. KOSKI: Object to form.

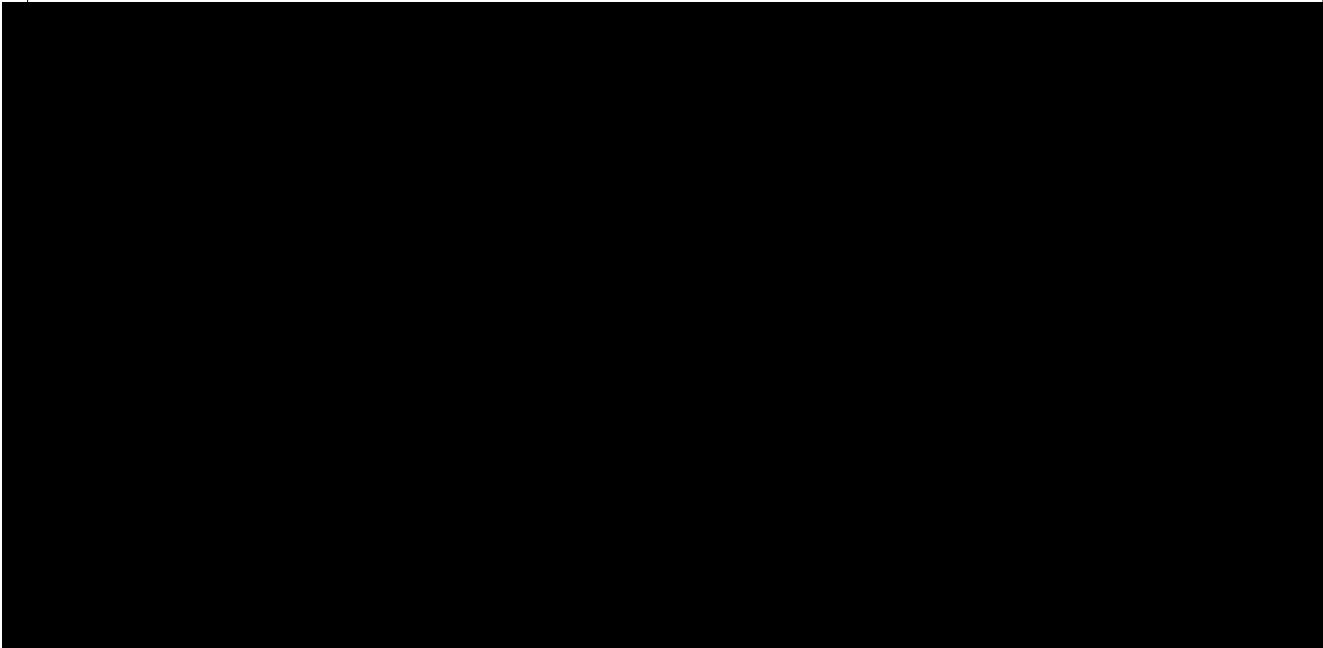
5 BY MR. STOLTZ:

6 Q. Did you review dispensing data for
7 customers -- for new customers that wanted to be
8 eligible for ordering controlled substances from Anda
9 after Robert Brown was hired?

10 A. There might have been a period while he was
11 in training, but after that, no. My responsibilities
12 went back to my full-time licensure.

13 Q. And how else did your responsibilities as
14 manager of regulatory compliance change after
15 Robert Brown was hired?

16 A. I went back to my original role of licensure.



23 MS. KOSKI: When you get to a good stopping
24 point, I think we have been going for about two

1 hours. I'm not rushing you now, but if now is
2 good.

3 MR. STOLTZ: Now is good.

4 THE VIDEOGRAPHER: The time is 11:03 a.m.
5 We're going off the record.

6 (Recess from 11:03 until 11:15 a.m.)

7 THE VIDEOGRAPHER: The time is 11:15 a.m. We
8 are now back on the record.

9 BY MR. STOLTZ:

10 Q. So the DEA regulations that Anda was
11 complying with -- regulatory compliance was in charge
12 of making sure Anda complied with, did that include
13 laws under the Controlled Substance Act?

14 MS. KOSKI: Object to form.

15 THE WITNESS: Can you please clarify?

16 BY MR. STOLTZ:

17 Q. Did Anda have a duty to report suspicious
18 orders under the Controlled Substance Act?

19 MS. KOSKI: Object to form.

20 I'll instruct you not to answer.

21 That's outside the special master's
22 limitation on questions regarding that.

23 You don't have to answer that question.

24 ///

1 BY MR. STOLTZ:

2 Q. So when was it that you stopped being
3 responsible for monitoring suspicious orders or
4 maintaining due diligence files, for example?

5 A. Me specifically, once Robert got on board in
6 2012, he had a training period. And once he was
7 situated, I -- I stopped.

8 Q. Did you have standard operating procedures
9 for suspicious order monitoring?

10 MS. KOSKI: Object to form.

11 THE WITNESS: We had SOPs for -- we have SOPs
12 for knowing your customer, yes.

13 BY MR. STOLTZ:

14 Q. And you had SOPs for the new customer set-up
15 process with regard to controls eligibility?

16 A. Yes, sir.

17 Q. And you also had SOPs for increasing that
18 limit of a thousand units --

19 A. Yes, sir.

20 Q. -- of controlled substances?

21 And SOPs for reviewing suspicious orders?

22 A. It was an all-inclusive SOP, I believe.

23 Q. Okay. I'm going to show you what's been
24 marked as Exhibit 4.

1 (Anda - Hall Exhibit 4 was marked for
2 identification.)

3 BY MR. STOLTZ:

4 Q. Does this document look familiar to you?

5 A. Yes, sir.

6 MR. STOLTZ: Excuse me. The Bates Number is
7 140495.

8 BY MR. STOLTZ:



[REDACTED]

3 Q. And is it your testimony that you were not
4 involved in suspicious order monitoring after
5 Robert Brown was hired by Anda?

6 A. I stated earlier I partner with the
7 individual groups to make sure that the SOPs are
8 up-to-date on an annual basis.

[REDACTED]

15 BY MR. STOLTZ:

16 Q. And is it your testimony that he was in
17 charge of suspicious order monitoring once he was
18 hired?

19 A. Yes.

[REDACTED]

10 Q. And that includes making changes to the SOP
11 itself up to February 2015?

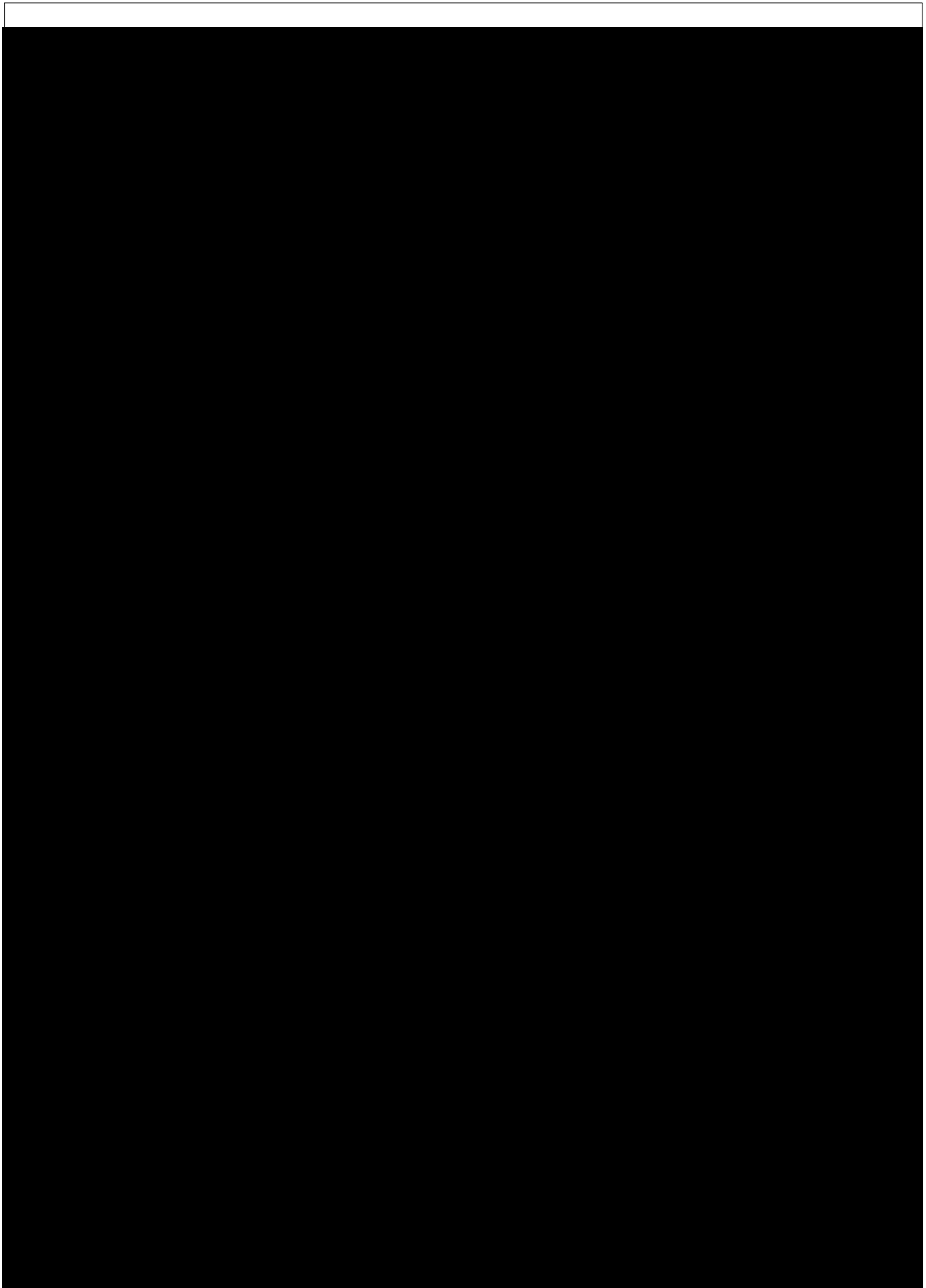
12 A. When applicable, yes, sir.

13 Q. So is it fair to say that you were involved
14 with suspicious order monitoring at least until
15 February of 2015?

16 MS. KOSKI: Object to form.

17 THE WITNESS: The SOP.

18 BY MR. STOLTZ:



1 of regulatory compliance; Robert Brown, the director
2 of compliance; and yourself, the manager of
3 regulatory compliance, would annually review the
4 standard operating procedure with respect to
5 suspicious order monitoring?

6 A. Yes, sir.

7 Q. What, if any, measures did Anda put in place
8 to prevent the diversion of opioids other than
9 monitoring suspicious orders?

10 MS. KOSKI: Object to form.

11 THE WITNESS: The due diligence beforehand,
12 setting up the customer.

13 BY MR. STOLTZ:

14 Q. Would that also include reporting suspicious
15 activity to the DEA?

16 MS. KOSKI: Object to form.

17 THE WITNESS: Can you please clarify?

18 BY MR. STOLTZ:

19 Q. Would Anda ever report suspicious orders,
20 orders of interest, to the DEA for the purpose of
21 preventing diversion?

22 A. Yes, sir.

23 Q. Do you recall if anyone at Anda or yourself
24 reported a suspicious order or an order of interest

1 to the DEA for the purpose of preventing diversion?

2 MS. KOSKI: Object to form.

3 THE WITNESS: Yes, sir.

4 BY MR. STOLTZ:

5 Q. Can you recall specific instances?

6 A. No, sir.

7 Q. Would you agree that suspicious orders
8 indicate that diversion may be taking place?

9 MS. KOSKI: Object to form.

10 THE WITNESS: Can you please clarify?

11 BY MR. STOLTZ:

12 Q. Would you agree that suspicious orders, like
13 suspiciously large orders or orders that deviate from
14 their dispensing patterns, would indicate that
15 diversion is taking place?

16 MS. KOSKI: Object to form.

17 BY MR. STOLTZ:

18 Q. The diversion of opioid products?

19 MS. KOSKI: Same objection.

20 THE WITNESS: Possibly.

21 BY MR. STOLTZ:

22 Q. Would you agree that one of the purposes of
23 Anda's suspicious order monitoring policy was to
24 prevent or minimize diversion?

1 A. Yes.

2 Q. Would you agree that signs of diversion can
3 be observed through dispensing data?

4 MS. KOSKI: Object to form.

5 THE WITNESS: Possibly.

6 BY MR. STOLTZ:

7 Q. Would you agree that a failure to collect
8 data could lead to diversion?

9 MS. KOSKI: Object to form.

10 THE WITNESS: Can you please clarify?

11 BY MR. STOLTZ:

12 Q. Would you agree that the failure to collect
13 dispensing data, questionnaire, or other data
14 required by Anda before making a sale of opioids, do
15 you agree that the lack of that data could cause Anda
16 to ship suspicious orders and contribute to
17 diversion?

18 MS. KOSKI: Object to form.

19 THE WITNESS: Possibly.

20 BY MR. STOLTZ:

21 Q. When Anda collected dispensing data, did it
22 collect that on a rolling basis or was that only
23 when -- when Anda collected dispensing data, what
24 instances would Anda collect dispensing data for

1 controlled substances?

2 A. The policy states for new customers.

3 Q. What about when a customer wanted to order
4 more controlled substances than was allowed by Anda?

5 A. Possibly, yes.

6 Q. Typically, how many months would Anda ask for
7 dispensing data?

8 A. I believe when -- 2011, 2012, I believe it
9 was about a three-month period.

10 Q. Would you agree that on order -- orders of
11 unusual frequency would indicate that diversion was
12 taking place?

13 MS. KOSKI: Object to form.

14 THE WITNESS: Not necessarily.

15 BY MR. STOLTZ:

16 Q. Would you agree it's possible?

17 A. Possible.

18 Q. Would you agree that three months of
19 dispensing data is not enough dispensing data to see
20 unusually -- let me rephrase that.

21 As a manager of regulatory compliance, were
22 you able to determine whether or not an order
23 deviated from their standard averages as far as
24 dispensing data, could you determine a deviation with

1 only three months of dispensing data?

2 MS. KOSKI: Object to form.

3 THE WITNESS: Can you please clarify?

4 BY MR. STOLTZ:

5 Q. How could you determine whether or not an
6 order was unusual if you only had three months of
7 dispensing data?

8 A. There was an algorithm built to determine.

9 Q. And that algorithm was based on the three
10 months of dispensing data?

11 A. No. The algorithm is based on the customer,
12 and then there's some -- it might even be in this
13 SOP, some -- some criteria that stops an order. And
14 one of those being unusual frequency.

15 Q. And the data that was input into that
16 algorithm would include three months of dispensing
17 data?

18 A. No, sir.

19 Q. What would be inputted into the algorithm?

20 A. As a secondary, the data of that customer
21 doing business with Anda.

22 Q. So Anda -- so after Anda approved the
23 customer to order controlled substances from it, it
24 would no longer look at the three months dispensing

1 data from when it was initially approved. At that
2 point, it would rely on the data of what Anda itself
3 had dispensed to that customer?

4 MS. KOSKI: Object to form.

5 THE WITNESS: Not necessarily.

6 BY MR. STOLTZ:

7 Q. What else would it rely on?

8 MS. KOSKI: Object to form.

9 You can answer, if you can answer.

10 THE WITNESS: Can you clarify, please?

11 MR. STOLTZ: Sure.

12 THE WITNESS: Thanks.

13 BY MR. STOLTZ:

14 Q. So you said as a secondary, the data of what
15 would be inputted into the algorithm would be -- as a
16 secondary, the data of what would be inputted into
17 the algorithm that customer doing business with Anda.

18 So just correct me if I'm wrong, but my
19 understanding of that statement is that in order to
20 determine whether a particular order was unusual, the
21 algorithm would look at the entirety of the history
22 and course of conduct, business with that particular
23 customer, and Anda?

24 A. Correct.

1 Q. As a secondary distributor, how could Anda
2 ever know the aggregate amount of opioids that a
3 customer was ordering from other sources?

4 MS. KOSKI: Object to form.

5 THE WITNESS: The dispensing data.

6 BY MR. STOLTZ:

7 Q. The three months of dispensing data or was --
8 was the aggregate dispensing data for customers
9 collected throughout a course of business with Anda,
10 or was that only at the initial stage of deciding
11 whether or not they were eligible for controls?

12 MS. KOSKI: Object to form.

13 THE WITNESS: Can you please clarify?

14 MR. STOLTZ: Sure.

15 BY MR. STOLTZ:

16 Q. Did Anda collect aggregate -- collect the
17 aggregate dispensing data of its customers,
18 specifically customers that used Anda as a secondary
19 distributor?

20 A. Yes, sir.

21 Q. So Anda was aware of the full amount of what
22 a -- Anda would know exactly how much a customer had
23 dispensed in opioids over every month that that
24 customer had been allowed to order opioids from Anda?

1 MS. KOSKI: Object to form.

2 THE WITNESS: I'm sorry, I'm still not clear.

3 MR. STOLTZ: Sure.

4 BY MR. STOLTZ:

5 Q. So on one hand we have Anda knowing what it
6 dispenses to a customer, right, and that data is
7 filtered through an algorithm in order to determine
8 whether or not an order is suspicious.

9 Is that accurate?

10 A. Yes, sir.

11 Q. And that data was only what Anda was
12 distributing to a particular customer.

13 Is that accurate?

14 A. Yes, sir.

15 Q. So would Anda know -- did Anda continue to
16 collect the aggregate amount -- so what a customer
17 was getting from a primary distributor, would it know
18 what it was getting from a primary distributor as
19 well as what Anda was distributing to that customer?

20 A. Correct. The dispensing data.

21 Q. And it would have that data for every month
22 that Anda had -- was doing -- was distributing
23 controlled substances to that customer?

24 MS. KOSKI: Object to form.

1 THE WITNESS: No.

2 BY MR. STOLTZ:

3 Q. How many months?

4 A. As I stated, I think at that time we
5 requested around three months, but it varied based on
6 customer.

7 Q. Okay. So past -- past the three months that
8 you would collect, Anda wouldn't continue to ask
9 those customers for their -- the entirety of their
10 dispensing data, or was there ever a time -- past the
11 initial three months of dispensing data that was
12 requested, was there an instance where Anda would
13 ever ask for aggregate data as to the total amount of
14 opioids that were being ordered both from Anda and
15 from primary distributors?

16 A. Yes, sir.

17 Q. And when did that occur?

18 A. So at initial as well as -- it varies per
19 customer, but sometimes if a customer was coming for
20 an increase and the data was older or it's been
21 awhile since we had some fresh data, we would
22 request.

23 Q. But until that time, until a customer asks
24 for an increase, Anda wouldn't know how much it had

1 ordered from its primary distributor in the month
2 prior?

3 A. Can you please clarify?

4 Q. Sure.

5 Unless a customer asks for an increase, Anda
6 wouldn't check to see how much that customer was
7 dispensing in aggregate, specifically opioids?

8 A. Dispensing data as well as our internal
9 system allowing us to capture what they were doing
10 with Anda.

11 Q. But that dispensing data wouldn't be
12 up-to-date. It would be from when they initially
13 became eligible to buy controls?

14 A. Initially when they became eligible and as
15 well as in situations we would request further
16 dispensing data.

17 Q. And one of those situations would be when
18 they would ask for an increase in how much they could
19 order?

20 A. Possibly, yes.

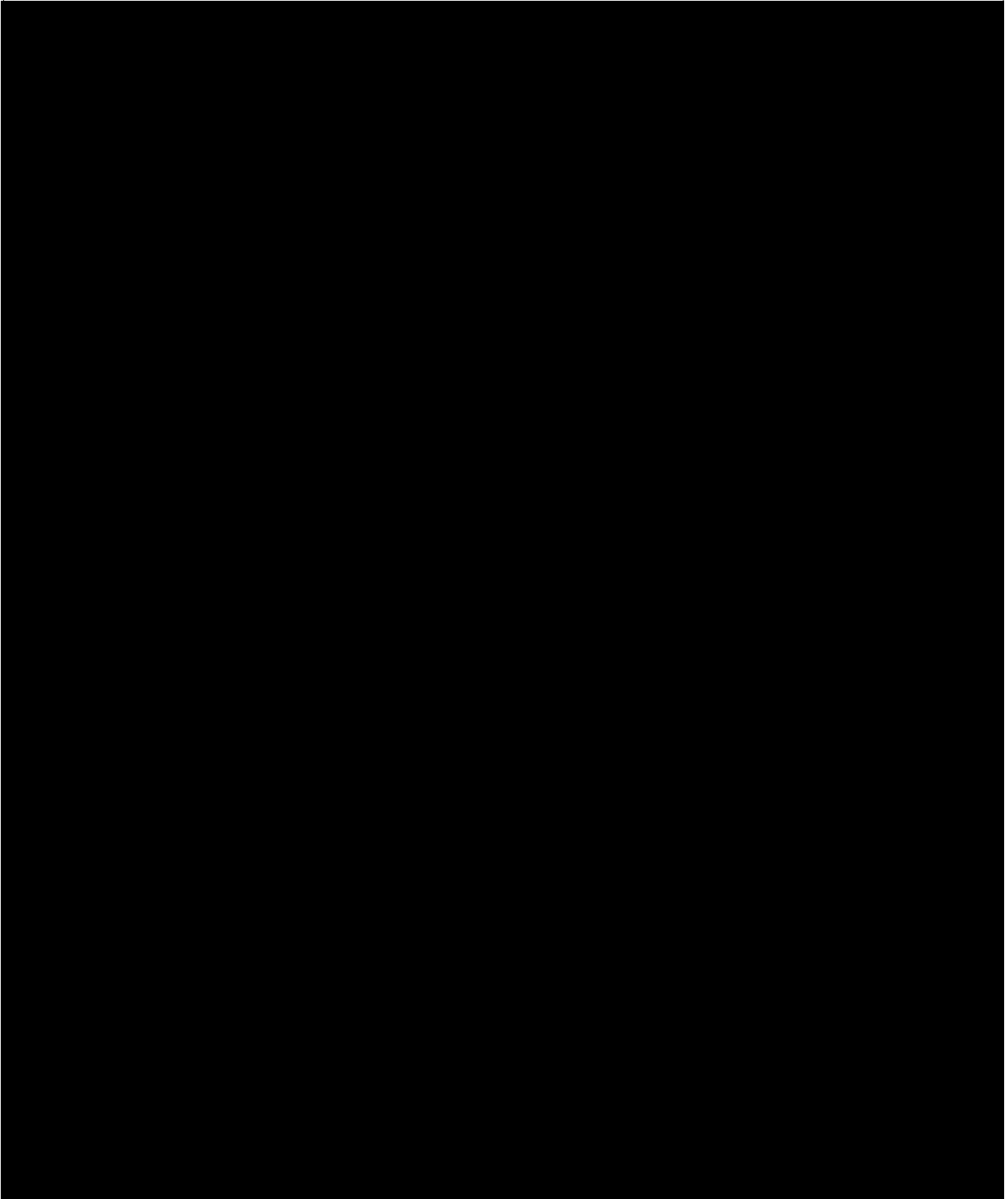
21 (Anda - Hall Exhibit 5 was marked for
22 identification.)

23 BY MR. STOLTZ:

24 Q. I'm showing you what's been marked as

1 Exhibit 5.

2 A. Okay.



23 Q. And if a customer of Anda wanted to increase
24 its limits on controlled substances or increase the

1 limits that Anda imposed upon that customer, what was
2 the -- what was the process for that?

3 A. We set up a process for the task management,
4 remedy, so this internal system that's called Remedy.

5 Q. So would the customer contact their sales rep
6 and ask for an increase?

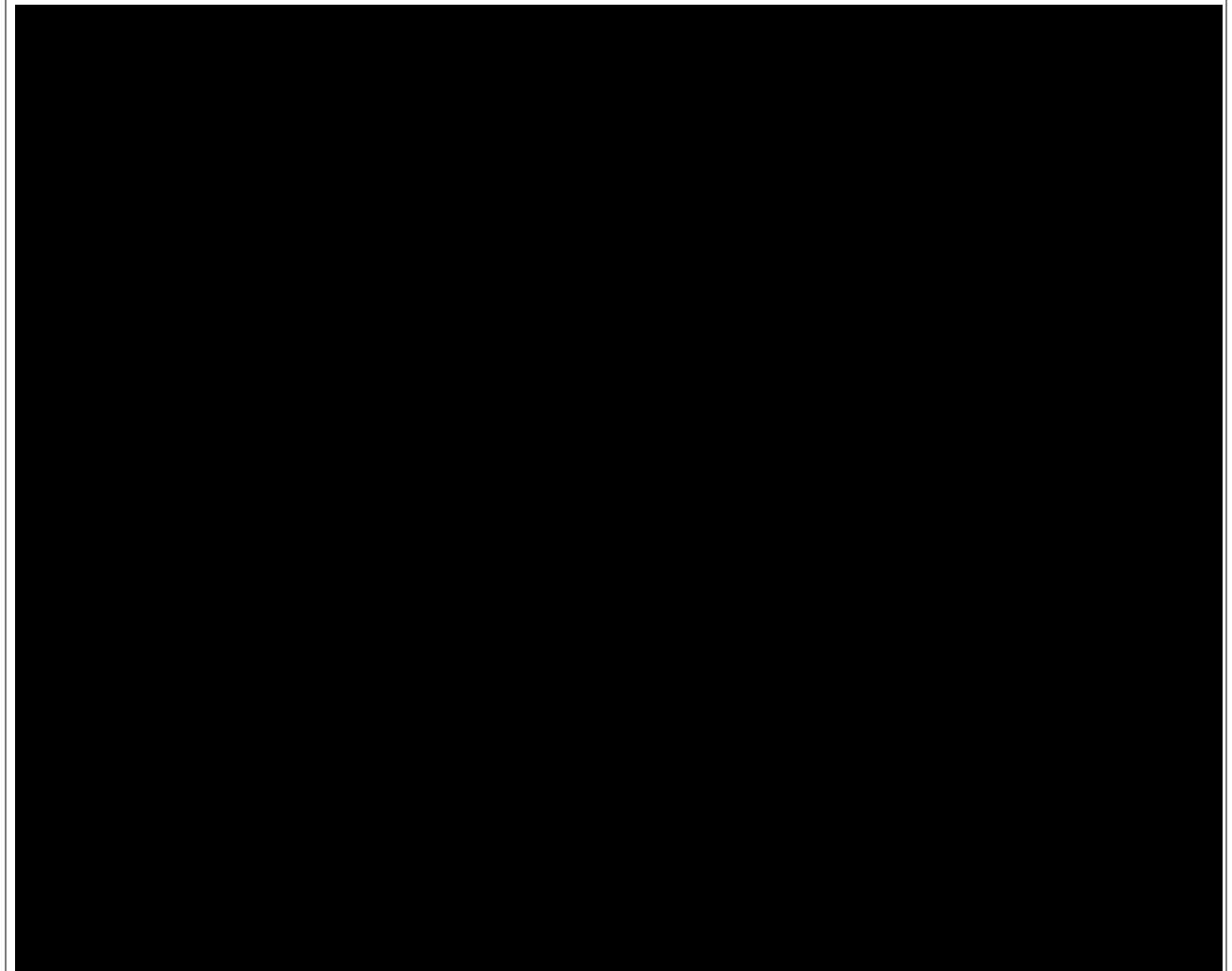
7 A. Yes, sir.

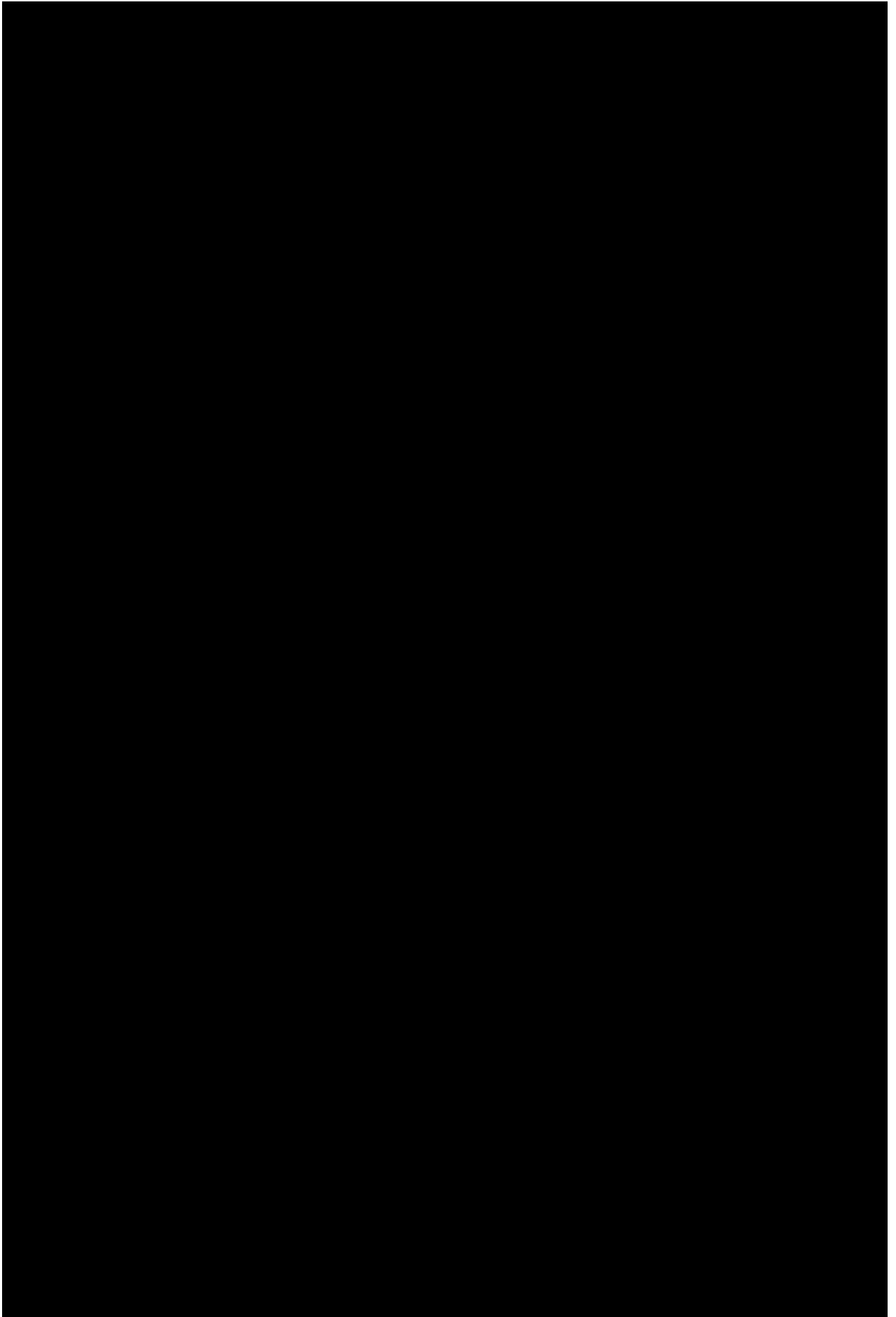
8 Q. And then what would that sales rep do?

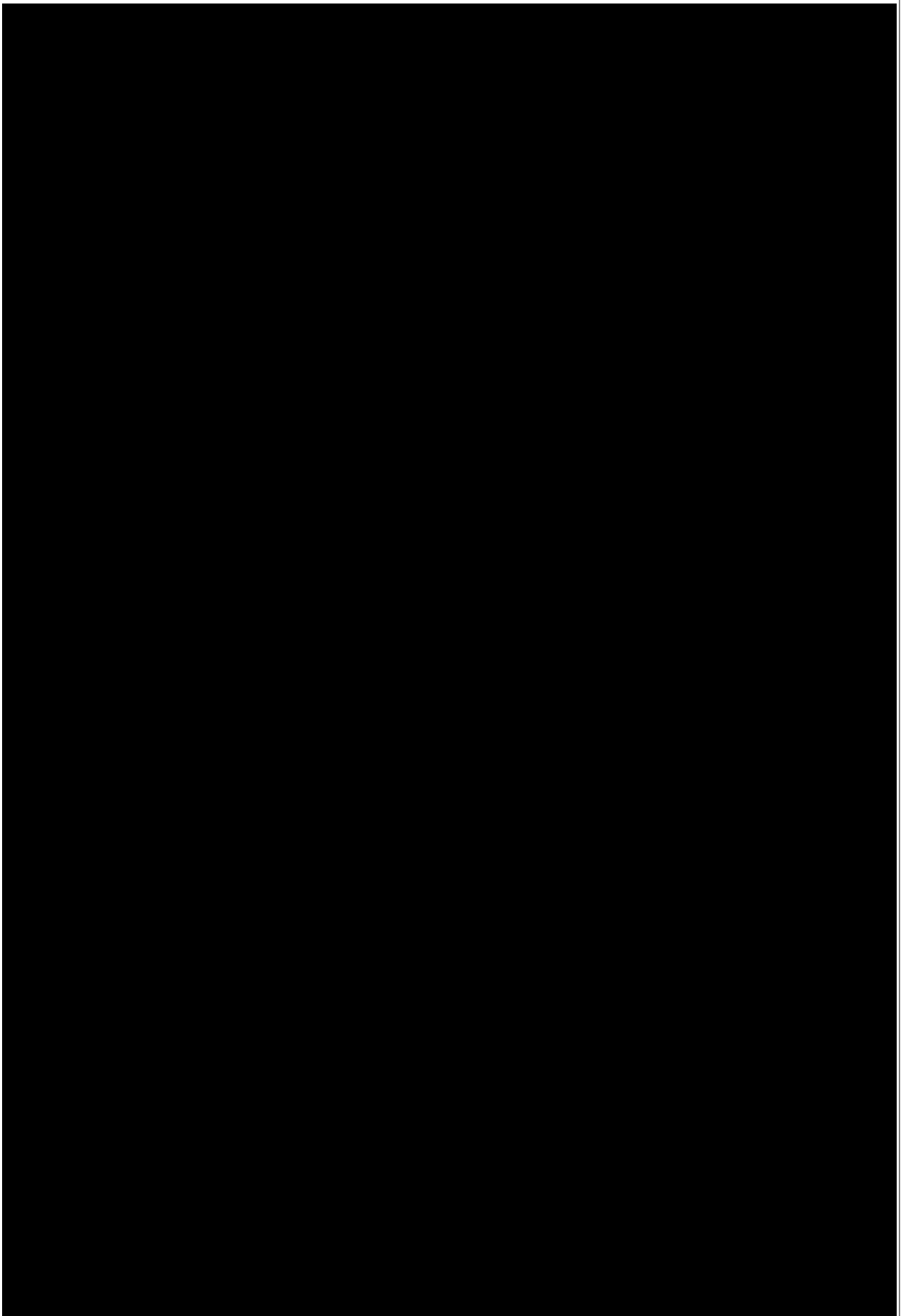
9 A. Submit a task in Remedy.

10 Q. And who would review that?

11 A. The DEA analyst.







2 Q. Do they request that data throughout the
3 relationship -- does Anda have every month of
4 aggregate dispensing data for all its customers that
5 are eligibles for controls?

6 A. No, sir.

7 Q. Does Anda only ask for aggregate data when a
8 customer has asked for an increase in their control
9 limit?

10 A. No, sir.

11 Q. Are there other instances in which Anda asks
12 a customer for aggregate dispensing volume?

13 A. New customer.

14 Q. Is that the only instance in which Anda asks
15 for aggregate dispensing data at to volume of opioids
16 dispensed?

17 MS. KOSKI: Object to form.

18 THE WITNESS: I can't say a hundred percent
19 that that would be the only two reasons.

20 BY MR. STOLTZ:

21 Q. Do you know of any other reasons why Anda
22 would have -- would request the aggregate volume of
23 dispensed controls?

24 A. Not off the top of my head.

1 Q. Is it true that sales was frustrated that
2 whenever they asked for an increase in the control
3 limit, not only would that control limit be denied,
4 but regulatory compliance would decide that that
5 customer was not a customer that Anda wanted to do
6 business with?

7 MS. KOSKI: Object to form.

8 THE WITNESS: I can't say what their feeling
9 was, but I can say that compliance was the final
10 deciding factor if Anda was going to do business
11 with -- controlled business with a customer.

12 BY MR. STOLTZ:

13 Q. Wouldn't you agree that prior to that
14 increase -- would you agree that had Anda had that
15 aggregate data, aggregate volume of controls being
16 dispensed -- if Anda had collected aggregate
17 dispensing data prior to an increase request, isn't
18 it true that many of these customers would have been
19 shut off from buying controls?

20 MS. KOSKI: Object to form.

21 THE WITNESS: I can't say that.

22 BY MR. STOLTZ:

23 Q. But can you say that customers often were
24 shut off from controls when aggregate dispensing data

1 was supplied to Anda?

2 A. At times, yes.

3 Q. And if that data had been available prior to
4 that time, they would have been cut off from controls
5 then, right?

6 MS. KOSKI: Object to form.

7 THE WITNESS: I can't say.

8 BY MR. STOLTZ:

9 Q. When someone in sales had a question of -- a
10 question about regulatory compliance, would they
11 often come to you?

12 A. Possibly, yes.

13 Q. And are requests for an increase in
14 controlled substance limits -- are those called
15 opportunities?

16 A. Remedy is where the opportunity lies. It's
17 just a task management.

18 Q. Did Anda ever conduct any audits of its own
19 suspicious order monitoring policies?

20 MS. KOSKI: Object to form.

21 THE WITNESS: Can you please clarify?

22 BY MR. STOLTZ:

23 Q. Did Anda ever contract with outside third
24 parties in order to determine the effectiveness of

1 their suspicious order monitoring policies?

2 MS. KOSKI: Object to form.

3 THE WITNESS: I can't say for certain.

4 Q. Were you ever provided any incentive to
5 identify suspicious orders?

6 MS. KOSKI: Object to form.

7 THE WITNESS: Can you please clarify?

8 BY MR. STOLTZ:

9 Q. Did Anda ever incentivize you to find
10 suspicious orders?

11 MS. KOSKI: Object to form.

12 BY MR. STOLTZ:

13 Q. Were you ever -- did you receive a bonus from
14 Anda?

15 MS. KOSKI: Object to form.

16 THE WITNESS: Yes.

17 BY MR. STOLTZ:

18 Q. And what was your bonus based on?

19 A. My bonus was based on my performance for the
20 previous year.

21 Q. And was part of your performance identifying
22 suspicious orders?

23 MS. KOSKI: Object to form.

24 THE WITNESS: At one time, yes.

1 BY MR. STOLTZ:

2 Q. Do you know if Anda has ever been penalized
3 by state or federal entities relating to its
4 monitoring or reporting related to controlled
5 substances?

6 MS. KOSKI: Object to form. Calls for
7 conclusion of law.

8 If you know as a matter of fact, you can
9 answer the question. You can answer if you know
10 as a matter of fact.

11 THE WITNESS: I don't know as a matter of
12 fact, no.

13 BY MR. STOLTZ:

14 Q. Would you agree that once opioids are
15 diverted, there's no way to control or even determine
16 where they will end up geographically?

17 MS. KOSKI: Object to form.

18 THE WITNESS: I can't say for certain.

19 BY MR. STOLTZ:

20 Q. Isn't it possible that a pharmacy
21 over-ordering -- isn't it possible that a large --
22 unusually large order of opioids sent to one state
23 could easily end up diverted to another state?

24 MS. KOSKI: Object to form.

1 Are you asking her a hypothetical?

2 MR. STOLTZ: Yes.

3 MS. KOSKI: About whether something is
4 possible or not?

5 MR. STOLTZ: Sure.

6 BY MR. STOLTZ:

7 Q. Would you agree that -- how about this.

8 Would you agree that Anda can't control or
9 even determine where -- where pills that it has
10 shipped -- opioids that are shipped -- it doesn't
11 have control or can't determine where those opioids
12 wind up?

13 MS. KOSKI: Object to form.

14 THE WITNESS: That's why it's important for
15 us to know who our customer is.

16 BY MR. STOLTZ:

17 Q. So you would agree?

18 MS. KOSKI: Object to form.

19 THE WITNESS: I don't -- can you please
20 clarify?

21 BY MR. STOLTZ:

22 Q. Would you agree that Anda -- in a large order
23 by Anda -- wouldn't you agree that Anda doesn't
24 have -- hold on.

1 Would you agree that Anda's profits increase
2 with the volume of drugs supplied to pharmacies?

3 MS. KOSKI: Object to form.

4 THE WITNESS: Yes.

5 BY MR. STOLTZ:

6 Q. If a suspicious order is held, what happens
7 next?

8 MS. KOSKI: Object to form.

9 THE WITNESS: A review of that customer
10 occurs.

11 BY MR. STOLTZ:

12 Q. What are the consequences of that review?

13 MS. KOSKI: Object to form.

14 THE WITNESS: Clarify, please.

15 BY MR. STOLTZ:

16 Q. What is the purpose of reviewing that
17 customer?

18 MS. KOSKI: Object to form.

19 THE WITNESS: To make sure that this is an
20 order that we want to ship to this customer.

21 BY MR. STOLTZ:

22 Q. And if you decide that that is an order that
23 you do not want to ship, then what happens?

24 A. Hypothetically, I mean, the policy is to

1 report it and cut the customer off.

2 Q. So the policy -- after a suspicious order is
3 held for review and ultimately is not shipped, the
4 policy is to report it? Who do you report it to?

5 A. To the local DEA offices.

6 Q. And when you report that suspicious order, do
7 you report just the customer, or is it the order
8 itself? How does that work?

9 MS. KOSKI: Object to form.

10 THE WITNESS: It varies.

11 BY MR. STOLTZ:

12 Q. What does it vary on?

13 A. If there is an order to report, we report the
14 order. If there's only a customer to report, we
15 would report the customer.

16 Q. In what type of instances would -- do you
17 report an order as opposed to a customer that ordered
18 it?

19 MS. KOSKI: Object to form.

20 THE WITNESS: Can you please clarify?

21 BY MR. STOLTZ:

22 Q. Well you said that either you report the
23 customer or you report the order itself. I'm just
24 asking: What type of scenario would you report the

1 order and not the customer?

2 A. No, I'm sorry. To clarify, the order will
3 always come over -- will always get reported with a
4 customer, yes.

5 Q. What other type of customers did Anda have --
6 or what other -- what other types of customer did
7 Anda distribute opioids to?

8 MS. KOSKI: Object to form.

9 BY MR. STOLTZ:

10 Q. Other than pharmacies, who did Anda
11 distribute opioids to?

12 MS. KOSKI: Object to form.

13 THE WITNESS: Can you please clarify?

14 BY MR. STOLTZ:

15 Q. Anda distributed drugs to pharmacies, retail
16 chains. What other types of customers?

17 A. In this time frame, the majority was all
18 pharmacies, whether it was an independent or --
19 excuse me -- retail, closed door, open door.

20 Q. Okay. Would Anda ever distribute to other
21 wholesalers or distributors?

22 MS. KOSKI: Object to form.

23 THE WITNESS: I believe after -- around this
24 time, there may have been one other wholesaler,

1 but our practice was not to distribute to
2 wholesalers.

3 BY MR. STOLTZ:

4 Q. When you decided that a customer is one that
5 Anda no longer wanted to do business with, did you
6 report that customer to the DEA?

7 A. Yes, sir.

8 Q. Was that always the policy while you were in
9 charge of making those type of decisions? Until
10 Robert Brown was hired?

11 A. Yes, sir.

12 Q. Who was responsible for reporting suspicious
13 orders to the DEA?

14 A. Compliance.

15 Q. And that was your department?

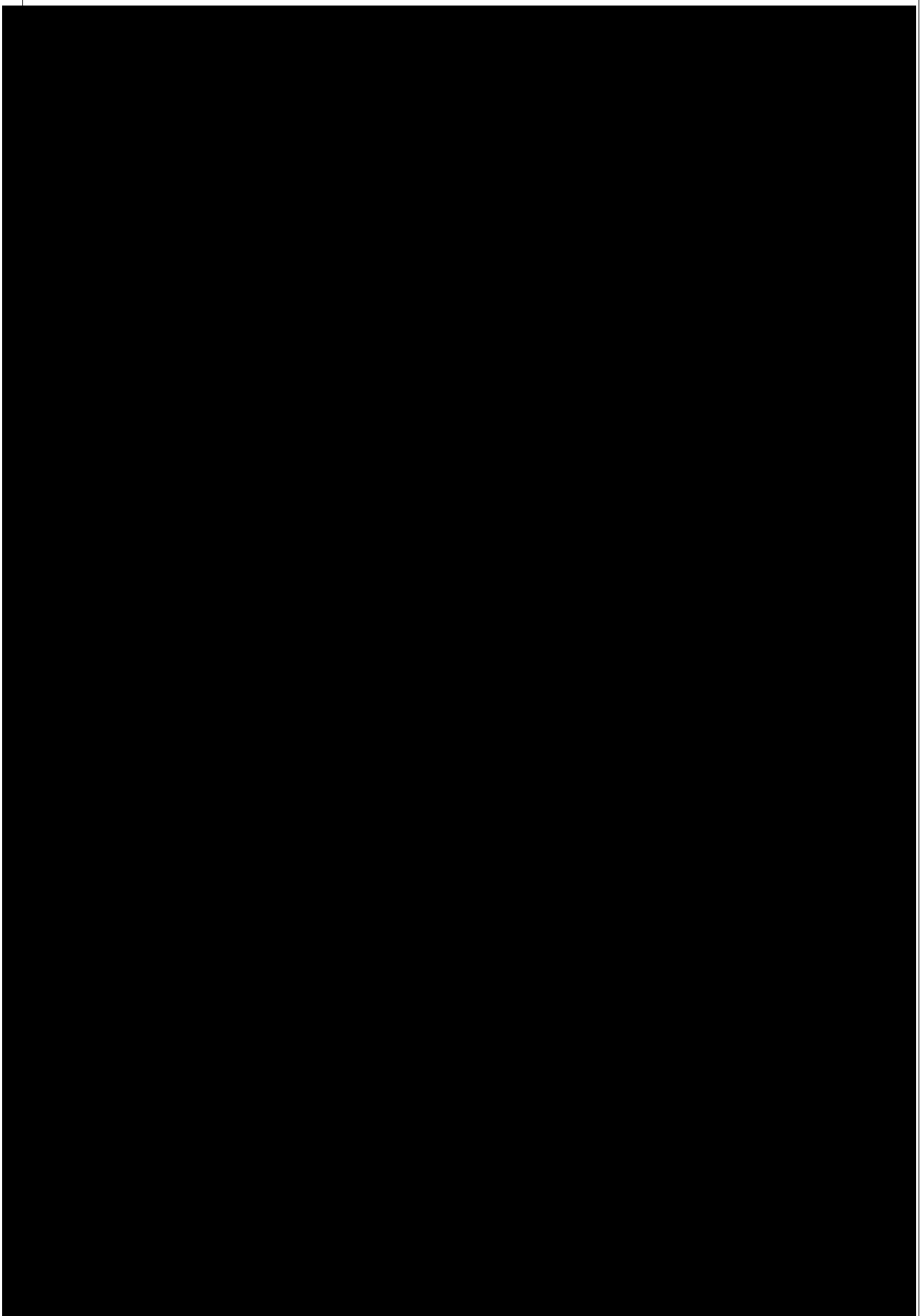
16 A. Yes, sir.

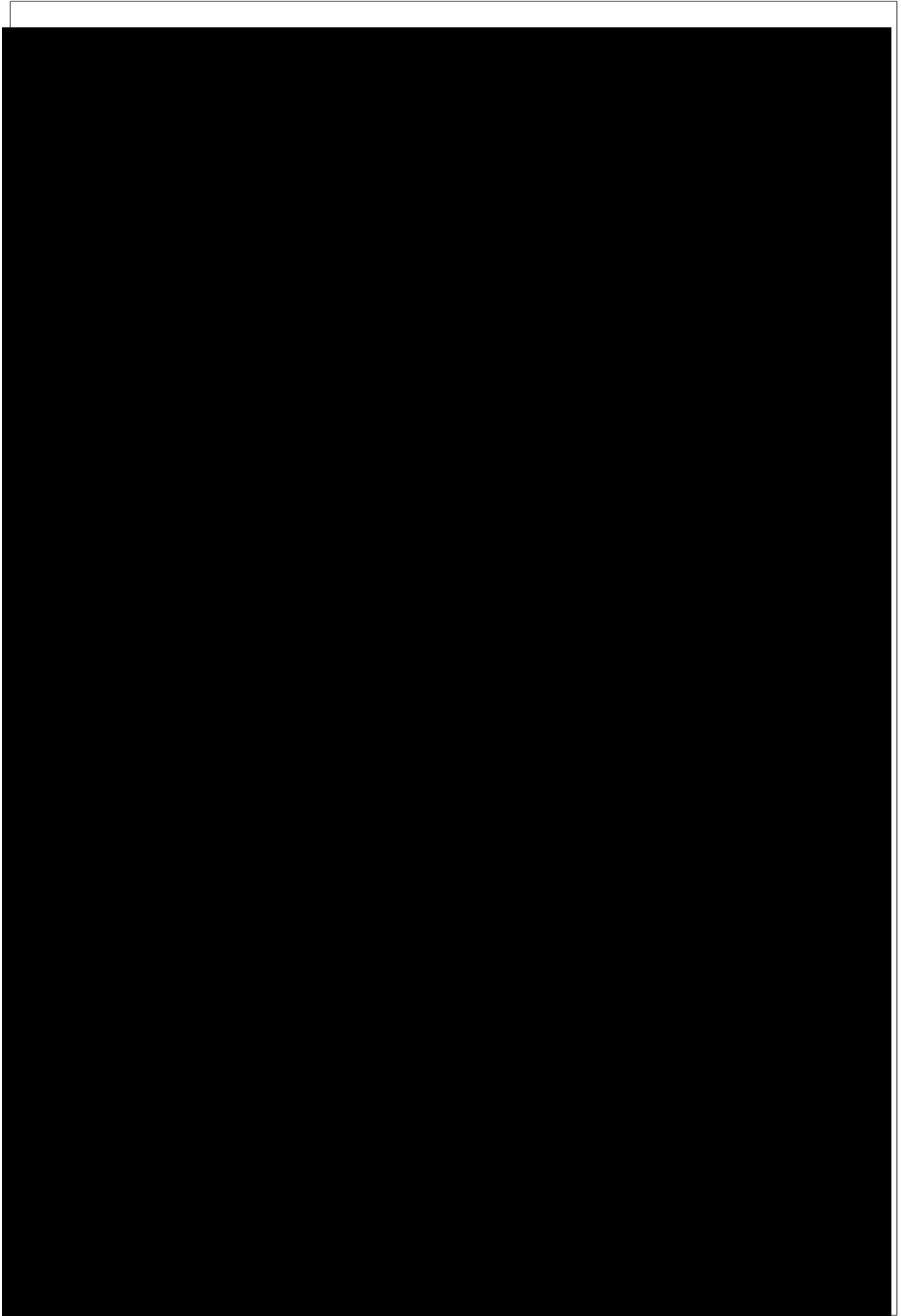
17 Q. I'm going to show you what's been marked as
18 Exhibit 6.

19 (Anda - Hall Exhibit 6 was marked for
20 identification.)

21 MR. STOLTZ: Bearing the Bates Number of
22 147166.

23 BY MR. STOLTZ:





1 A. So a limit is what a customer is granted,
2 right? This is your limit. You can't go over this
3 limit when we talked about 1,000-unit family limit.

4 This is an algorithm. So if they place an
5 order within that 1,000 family unit, let's say one
6 piece of something, and it gets flagged based on this
7 algorithm, any of these steps, that is now considered
8 a suspicious order in the bucket. Bucket.

9 Q. And then that bucket would be referred to the
10 DEA? If a customer's order got put in the bucket,
11 that bucket is being sent to the DEA, or is it being
12 sent somewhere else?

13 A. No. This is an internal bucket to review
14 suspicious orders.

15 Q. So a customer would have to order more than
16 eight times its average in order for that order to be
17 held?

18 A. No. So you take the whole -- the whole
19 line -- you take the DEA quantity for that month. So
20 everything they did for that month, times it by the
21 six-month -- I mean, excuse me, divide it by the
22 six-month time frame, and then you multiply that by
23 the multiplier.

24 Q. So would it be possible for -- so if

1 somebody -- if somebody ordered past their limit --
2 let's say their limit is 5,000 units. If a customer
3 tried to order 6,000 units, is that a suspicious
4 order?

5 A. A customer cannot order past their limit.

6 Q. Okay. And if they attempt to order past
7 their limit, what happens then?

8 A. They can't.

9 Q. Does that ever get reported in any system?

10 A. No.

11 Q. Does that order ever get referred to the DEA
12 as suspicious?

13 A. Not that I'm aware of.

14 Q. What is the purpose of the control limit?

15 A. It's a comfort level for us to give them a
16 specific quantity for a family based on when we set
17 them up and we did the review on them.

18 Q. Is the control limit mechanism in which Anda
19 can avoid shipping suspicious orders?

20 MS. KOSKI: Object to form.

21 THE WITNESS: Can you please clarify?

22 BY MR. STOLTZ:

23 Q. Is the control limit purpose to avoid
24 shipping suspicious orders to customers?

1 A. No, sir.

2 Q. It's the control -- so it's your testimony
3 that the control limit that's imposed upon Anda's
4 customers, specifically related to controlled
5 substances, is entirely separate and apart from the
6 suspicious order monitoring system?

7 MS. KOSKI: Object to form. It
8 mischaracterizes testimony.

9 You can answer if you can answer it. You can
10 let him know if you can't.

11 BY MR. STOLTZ:

12 Q. Anda doesn't want to ship suspicious orders,
13 right?

14 A. Yes.

15 Q. And part of that reason is because, if it
16 does, it can contribute to diversion?

17 A. Yes, sir.

18 Q. And another reason would be that it could
19 have fines imposed?

20 MS. KOSKI: Object to form.

21 BY MR. STOLTZ:

22 Q. And part of regulatory compliance's job is to
23 avoid situations where Anda is contributing to the
24 diversion of opioids, right?

1 A. Putting the company at risk, yes, sir.

2 Q. And one way to put the company at risk would
3 be to -- to contribute to diversion?

4 MS. KOSKI: Object to form.

5 BY MR. STOLTZ:

6 Q. One way to put the company at risk would be
7 to accidentally ship suspicious orders.

8 Is that accurate?

9 A. Possibly, yes, sir.

10 Q. Is the purpose behind the control limit
11 imposed by Anda upon its customers to avoid getting
12 Anda into -- to avoid putting the company at risk?

13 A. That's part of, yes, sir.

14 Q. And how are those limits decided upon?

15 A. At new account setup, we have a standard
16 setup limit for basic retail pharmacies that are of a
17 certain size. But if anything, from there, if
18 there's a greater volume or a bigger pharmacy, then
19 we can review individually.

20 Q. So if a mom-and-pop pharmacy has a limit of
21 1,000 units and they are within that limit for as
22 long as Anda's been doing business with them, all of
23 a sudden that pharmacy orders 100,000 units, they
24 wouldn't be able to get that from Anda?

1 A. Correct.

2 Q. Would that be a suspicious order?

3 MS. KOSKI: Object to form.

4 THE WITNESS: No. The limit is set. So they
5 cannot go past that limit unless it's requested.

6 BY MR. STOLTZ:

7 Q. Right. I understand why the limit is set.
8 The limit is set to prevent pharmacies from ordering
9 more than their limit, correct?

10 A. If they attempted -- if they had a 1,000
11 limit family and they attempted to order 100,000,
12 they would not be able to.

13 Q. They would not be able to?

14 A. They have a hard stop, yes.

15 Q. And that would not be reported to the DEA?

16 A. No.

17 Q. I'm going to show you what's been marked as
18 Exhibit 7.

19 (Anda - Hall Exhibit 7 was marked for
20 identification.)

21 MR. STOLTZ: Bates number 137399.

22 BY MR. STOLTZ:

23 Q. Do you recognize this e-mail from Mary Barber
24 to you?

1 A. No, sir.

2 Q. But this is an e-mail from Mary Barber to
3 you?

4 A. It appears that way.

5 Q. And this was sent on -- in August of 2013?

6 A. Yes, sir.

7 Q. And Mary Barber is a DEA compliance analyst,
8 right?

9 A. Yes, sir.

10 Q. Was she one of your -- did she direct -- did
11 she report directly to you?

12 A. No, sir.

13 Q. She asks you -- what does she ask you to do
14 in -- excuse me.

15 She says to you and Sabrina Solis and Latoya
16 Samuels, she says: New account. Control is denied.
17 DD on file. Customer 499221, Staywell Pharmacy.
18 Located in Tampa, Florida.

19 She then sends a follow-up e-mail to you less
20 than an hour later, saying: Please do not report
21 this account.

22 Did you have the final say on whether or not
23 to report an account or an order to the DEA?

24 MS. KOSKI: Object to form.

1 THE WITNESS: Can you please clarify?

2 BY MR. STOLTZ:

3 Q. You testified earlier that once a customer
4 made a suspicious order, that would be referred to
5 the DEA, right?

6 A. Yes, sir.

7 Q. Was that an automatic process, or would you
8 have the autonomy to decide whether or not to report
9 that suspicious order?

10 MS. KOSKI: Object to form. Mischaracterizes
11 the document.

12 BY MR. STOLTZ:

13 Q. Was reporting suspicious orders to the DEA --
14 was that an automatic process?

15 A. No, sir.

16 Q. Would you decide whether or not you wanted to
17 report a suspicious order to the DEA?

18 MS. KOSKI: Same objection.

19 You can answer.

20 THE WITNESS: At this time, no. The analyst
21 would make the determination.

22 BY MR. STOLTZ:

23 Q. Why would she send this to you?

24 MS. KOSKI: Object to form.

1 BY MR. STOLTZ:

8 Q. Was it the standard operating procedure for a
9 DEA compliance analyst, at least in 2013 or up to
10 2013, to tell you whether or not something should be
11 reported?

12 A. There was a report that would get submitted,
13 and everyone would funnel it through that specific
14 person. Maybe at that time it was me. I can't say
15 for certain.

16 Q. Do you recall the name of that report, if it
17 had a standard name or a format?

18 A. I believe the report is called Customer
19 Cutoff.

20 Q. And that Customer Cutoff Report, that
21 would -- or might have come through you, up through
22 2013?

23 A. Yes, sir. Around 2010 until -- I'm not sure
24 the end time, but probably around this time.

1 Q. And you would decide whether or not to send
2 that report to the DEA?

3 A. No, sir.

4 Q. Did the person who had that job of getting
5 the Customer Cutoff Report, would they have that
6 decision as to whether or not to report it to the
7 DEA?

8 A. The analyst would make the final
9 determination.

10 Q. And at this point you may have been an
11 analyst?

12 A. No, sir.

13 Q. But you may have been the person making the
14 decision at this point?

15 A. No, sir. The analyst, Mary Barber.

16 Q. You just testified that, you know, when I
17 asked you, and that Customer Cutoff Report, that
18 would come through you up until 2013? And you said,
19 yes, sir, around 2010 until -- I'm not sure.

20 So at one point it was your responsibility to
21 send or not send a cutoff -- a Customer Cutoff Report
22 to the DEA?

23 A. The file at one point was sent by me. The
24 analyst would make the final determination.

1 MS. KOSKI: I just want you to know lunch is
2 available whenever you want to stop.

3 MR. STOLTZ: Yeah. Sure. Let's take lunch.

4 MS. KOSKI: You want to do it now?

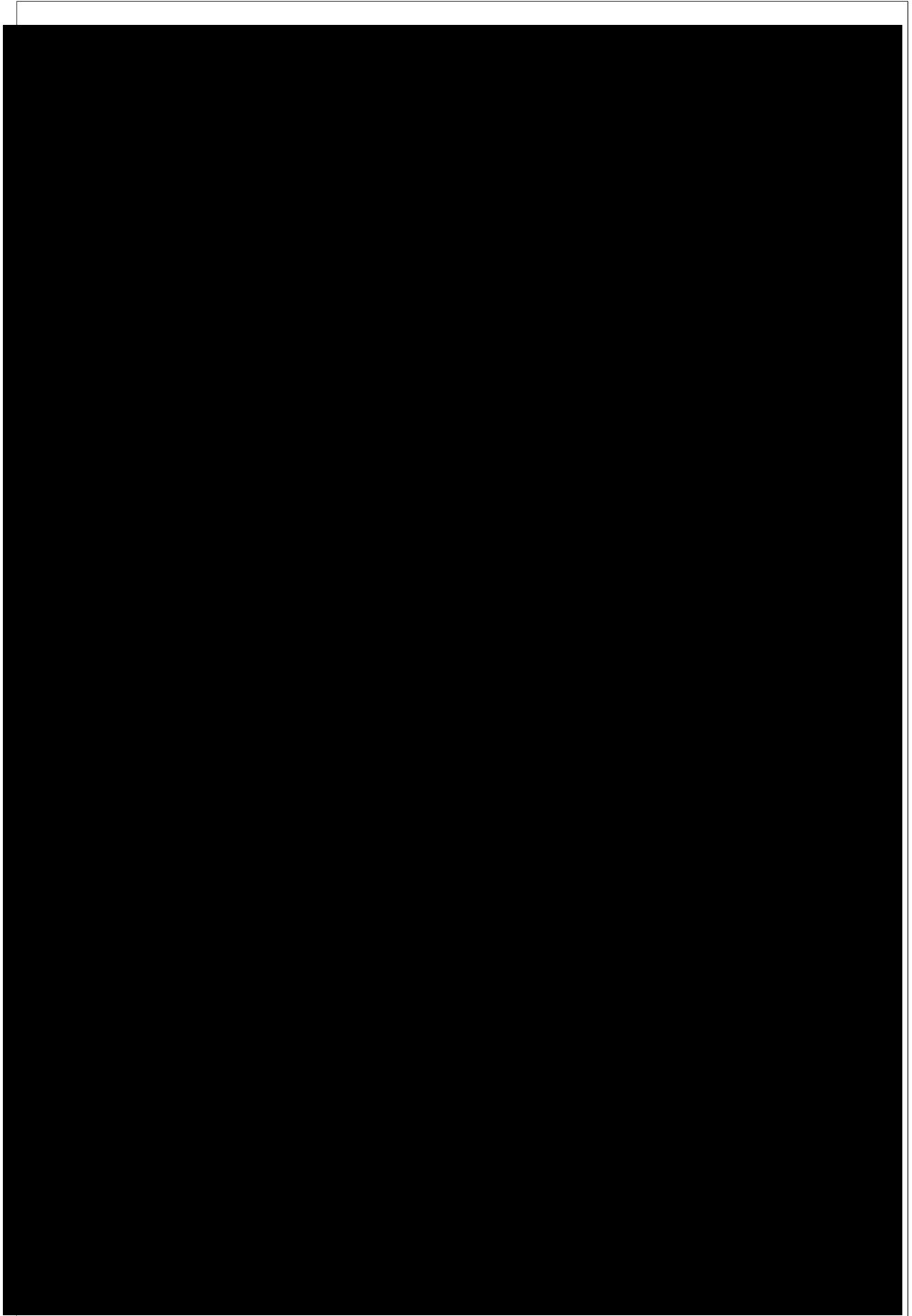
5 MR. STOLTZ: Yeah.

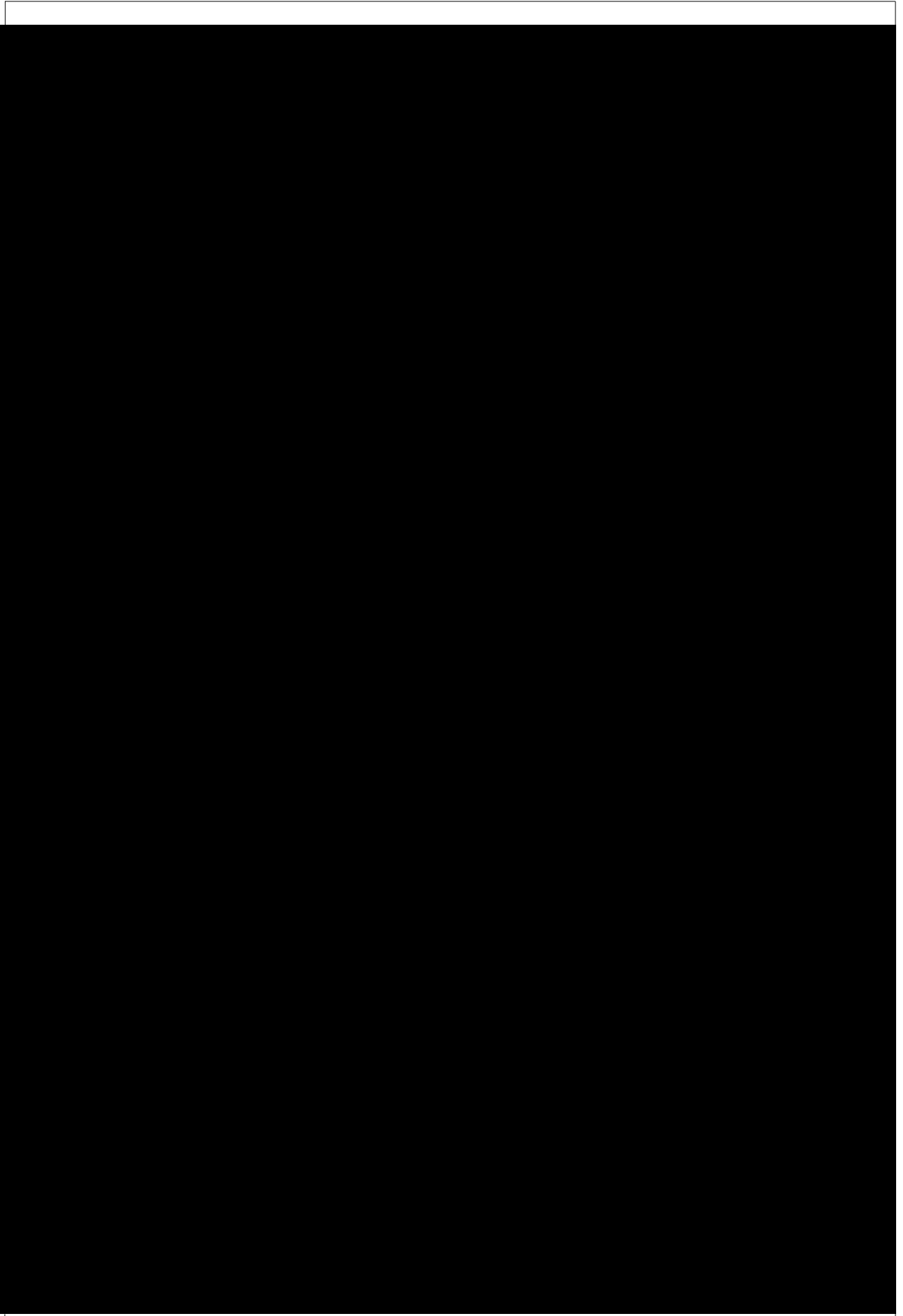
6 THE VIDEOGRAPHER: The time is now 12:27. We
7 are going off the record.

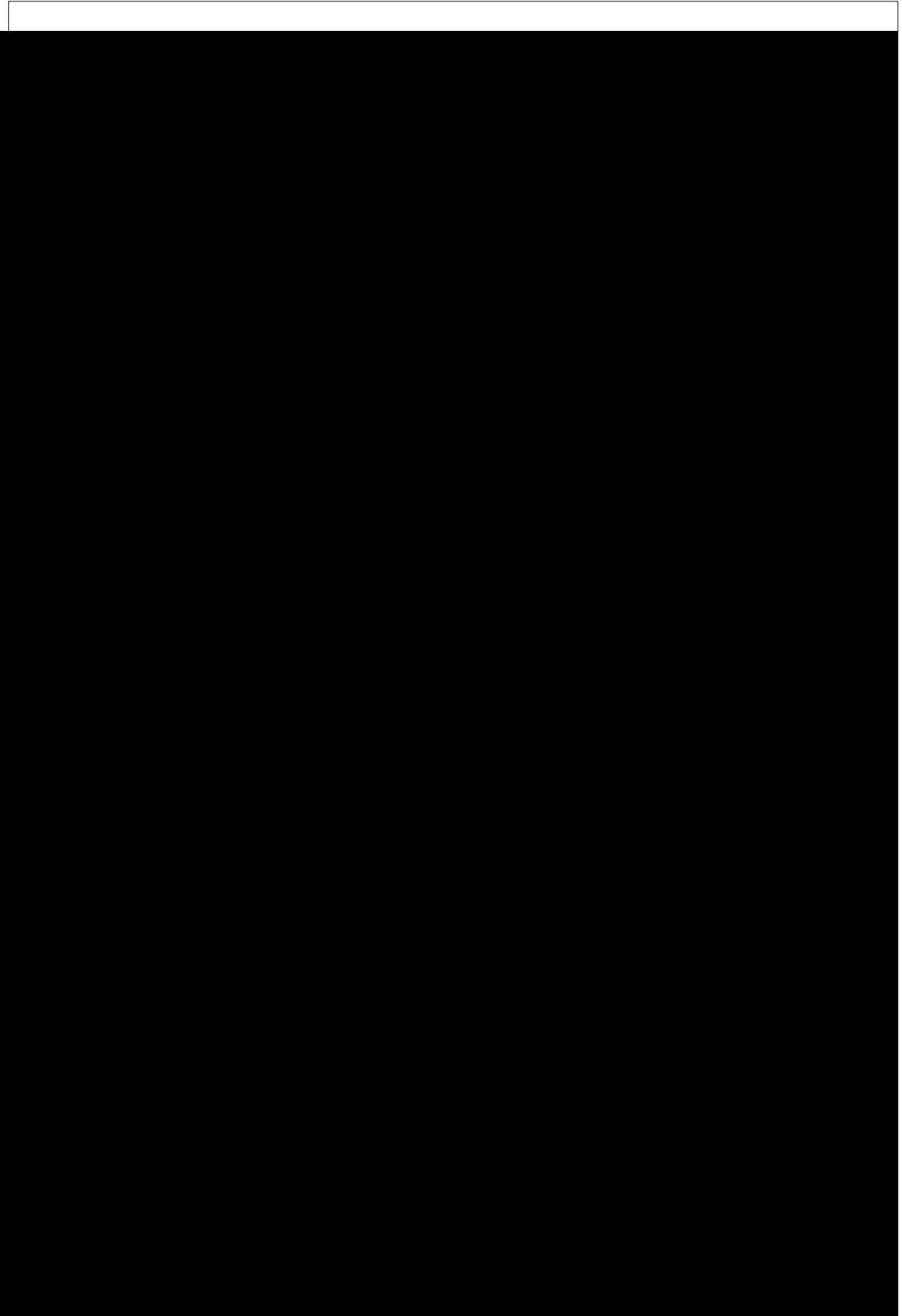
8 (Recess from 12:27 until 1:18 p.m.)

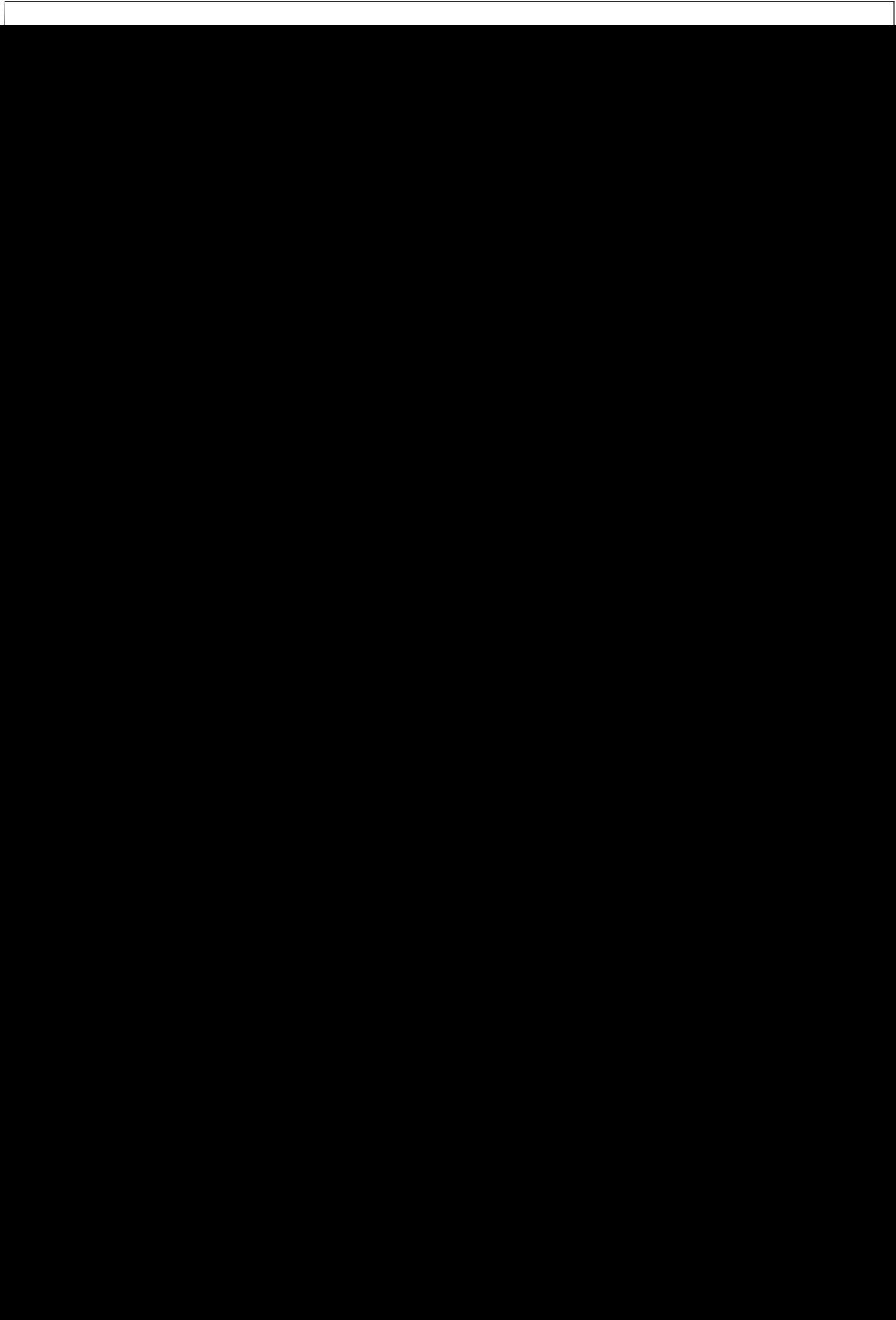
9 THE VIDEOGRAPHER: The time is 1:18 p.m. We
10 are now back on the record.

11 BY MR. STOLTZ:









14 Q. Deleted orders get reported to the DEA?

15 A. Yes, sir.

16 Q. Okay. And this is the -- are you aware of
17 another standard operating procedure with regards to
18 suspicious order monitoring?

19 A. I believe there is a newer version.

14 Q. Okay. When it comes to a situation where
15 there's a promotion for a controlled substance, those
16 aren't indefinite promotions, are they? Those are
17 usually limited time offers?

18 MS. KOSKI: Object to form.

19 THE WITNESS: As far as I am aware, when I
20 was in this role, I was not aware of any
21 promotions.

22 BY MR. STOLTZ:

23 Q. Okay.

24 A. So I can't answer that.

1 Q. So if there was a reason to release a hold
2 or -- and I know it doesn't pertain to this
3 document -- but increase the limit for a customer on
4 a limited basis, for example, a promotion that Anda
5 was offering, would that increase and their limits
6 also be limited to that time period? Or would that
7 continue on indefinitely?

8 MS. KOSKI: Object to form.

9 THE WITNESS: I can't say, because I was not
10 aware of any promotions. So I don't know.

11 BY MR. STOLTZ:

12 Q. Was there ever a time when limits would be
13 lowered?

14 MS. KOSKI: Object to form.

15 THE WITNESS: Possibly. I can't say for
16 certain.

17 BY MR. STOLTZ:



16 MR. STOLTZ: The PowerPoint showed up a
17 couple times in her custodial file, and this is
18 the one I have. But let me just . . .

19 MS. KOSKI: It's your deposition. I just
20 want to be clear that to the extent there's
21 content in the e-mail, it's not necessarily
22 reflected in this attachment.

23 MR. STOLTZ: Okay. I think in context it
24 will make a little bit more sense.

1 BY MR. STOLTZ:



16 MS. KOSKI: I'm going to object to preserve
17 the record that they are not sequential Bates
18 numbers. So we don't know if it actually refers
19 to that PowerPoint.

20 MR. STOLTZ: Okay.

21 BY MR. STOLTZ:

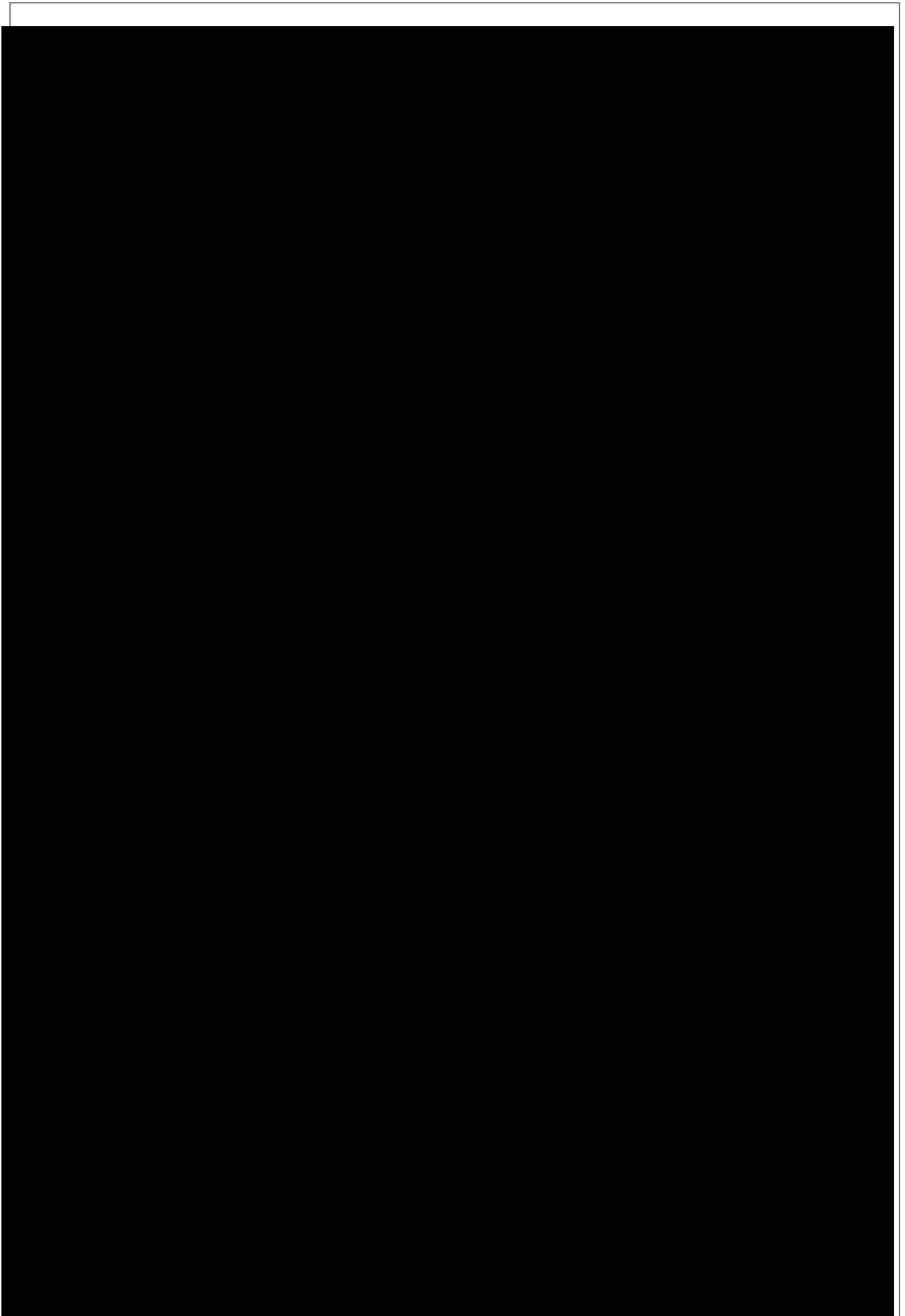
15 Q. Here's the PowerPoint with the sequential
16 Bates.

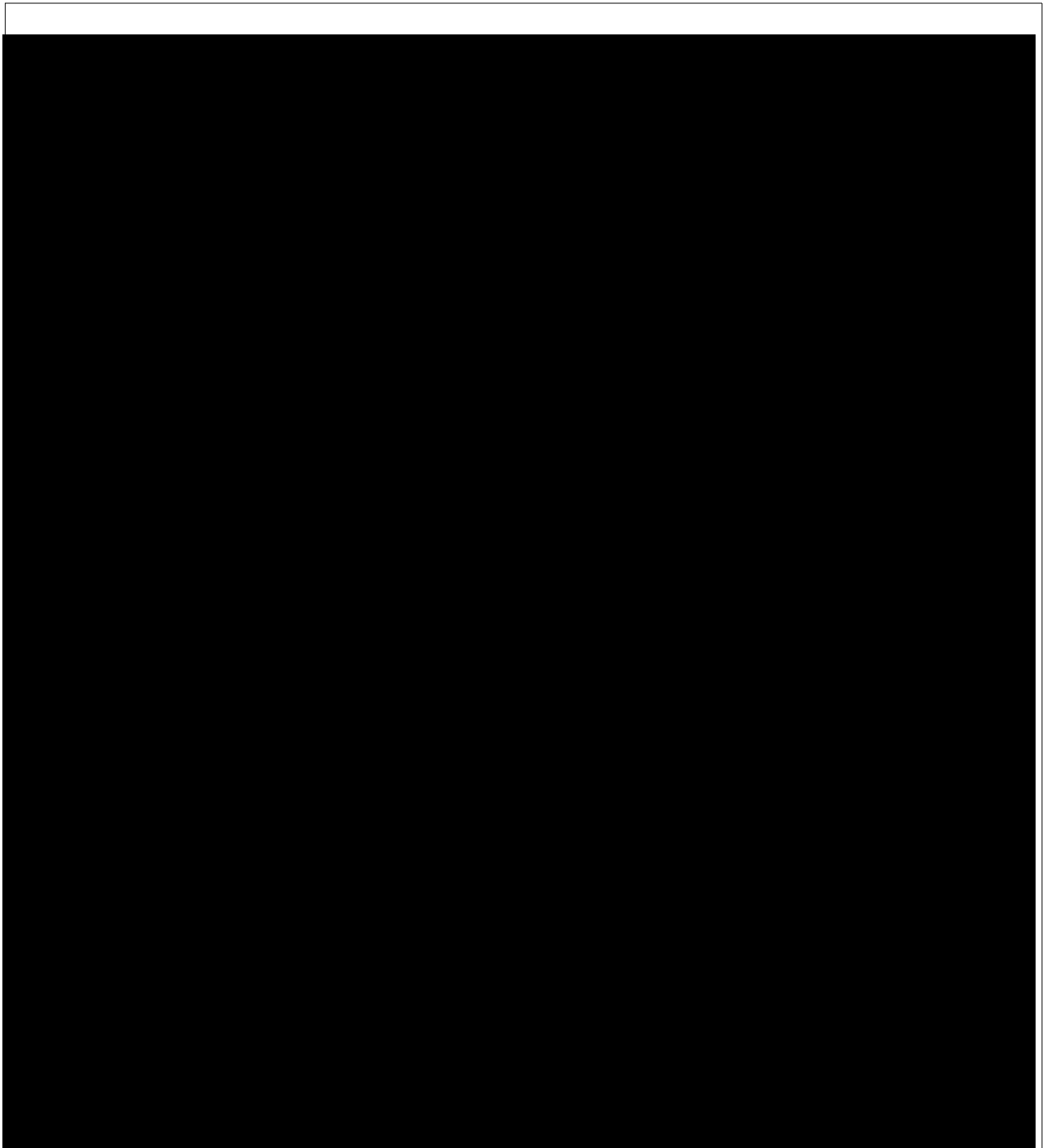
17 (Conferring with counsel.)

18 MS. KOSKI: You printed in native. That's
19 what it is.

20 MR. STOLTZ: Well, I'll be happy to provide
21 it with the Bates numbers on the bottom, but the
22 Bates numbers for the PowerPoint are also 132598.

23 BY MR. STOLTZ:





19 Q. And did you ever report a suspicious
20 customer?

21 A. Yes, sir.

22 Q. At what point did it change to reporting a
23 suspicious order?

24 A. I can't say for certain.

1 Q. But it did at some point change to reporting
2 suspicious orders?

3 A. It was a multiple. I spoke about this
4 earlier where it is -- I'm sorry -- suspicious
5 customer or a suspicious order.

6 Q. So there is instances in which Anda would
7 report a suspicious order and other instances in
8 which they would report a suspicious customer?

9 A. Yes, sir.

10 Q. I think we went over this as well, but
11 when -- if -- if a customer made a suspicious order
12 and that order was held by Anda and ultimately not
13 released by Anda, how is it that that customer
14 wouldn't also be suspicious, just the order itself
15 would be?

16 A. Well, it would. As I stated earlier, you're
17 still -- we would still submit the customer
18 information. It would just have, along with it, an
19 order -- specific order tied to it.

20 Q. So, in 2012, you would just give the DEA a
21 suspicious customer without reference to a particular
22 order?

23 A. We were doing all of our validation up front
24 with the customers. So we were basically fielding

1 off who we wanted to do business with prior to them
2 becoming a customer and becoming -- having suspicious
3 orders.

4 Q. So by doing your validation up front -- I'm
5 just trying to understand what's changed.

6 By doing your validation up front, you were
7 able to avoid having any suspicious orders?

8 A. We were still monitoring orders, but they
9 were orders of interest, not suspicious orders.

10 Q. Orders of interest?

11 A. Yes, sir.

12 Q. Were there any other levels of, like,
13 particular orders or strange orders? Just orders of
14 interest and then suspicious?

15 MS. KOSKI: Object to form.

16 THE WITNESS: Yes, sir.

17 BY MR. STOLTZ:

18 Q. How many different tiers of suspicion were
19 there?

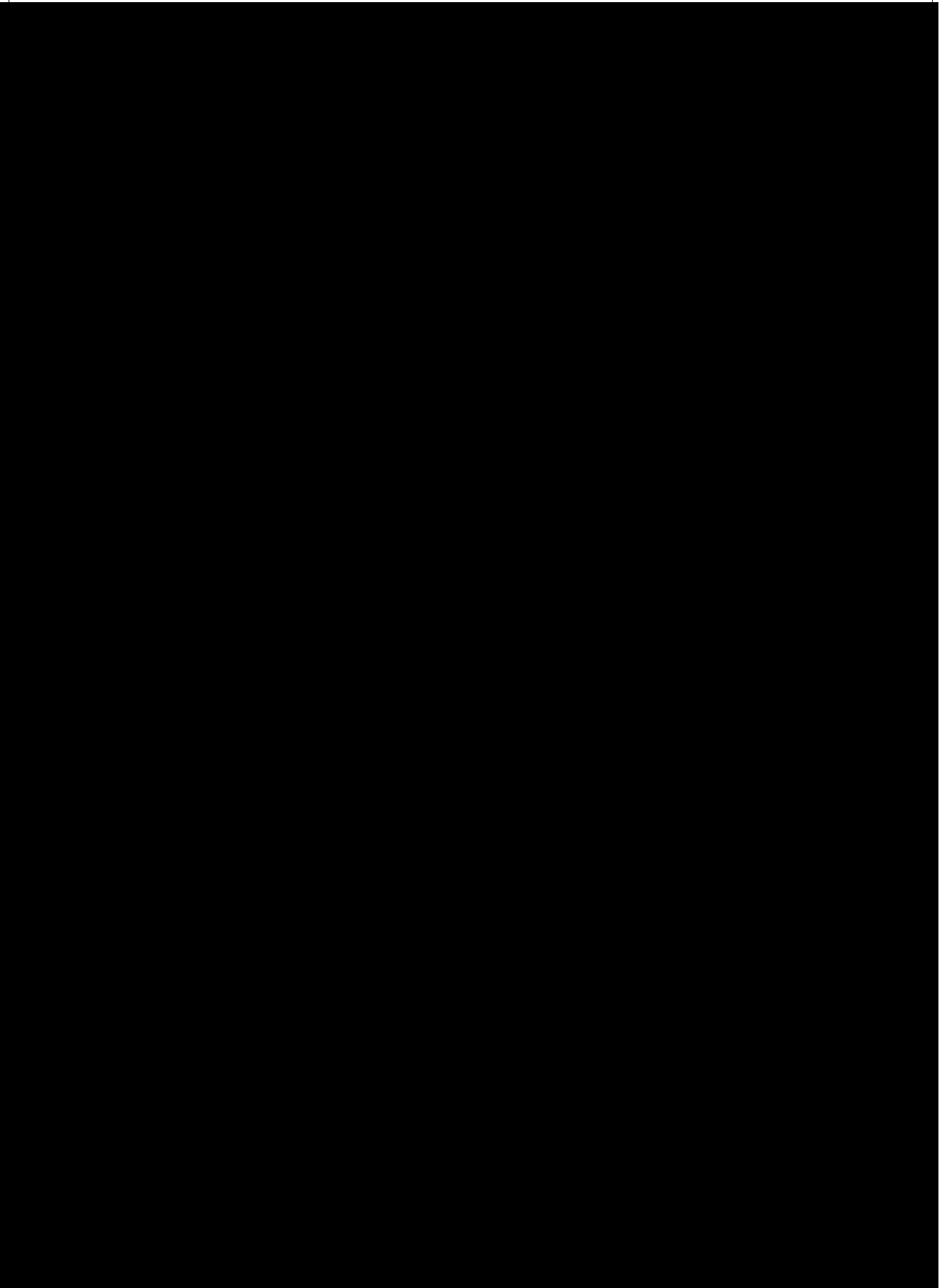
20 MS. KOSKI: Object to form.

21 BY MR. STOLTZ:

22 Q. Were there other tiers of suspicion --
23 suspicious orders?

24 A. All orders are orders of interest until they

1 become suspicious.



14 Q. Do you have an algorithm for capturing
15 suspicious orders?

16 A. Orders of interest can become a suspicious
17 order. So after you review it and it -- if things
18 don't check out, then it becomes a suspicious order.

19 Q. So the algorithm identifies what could be
20 suspicious orders, but they can't be deemed -- they
21 can't be deemed suspicious until someone -- someone
22 finds out whether or not one of these eight factors
23 is at play, like an increased supply to new/existing
24 customer or patient or increased supply to a new

1 facility, consistent with order pattern, increase in
2 stock due to promotion, first time order, consistent
3 with customer class order pattern, administration
4 release, or released unchanged with DEA/state
5 authority concurrence.

6 All of those could be reasons why an order of
7 interest wouldn't be suspicious?

8 A. Correct.

9 MS. KOSKI: Object to form.

10 BY MR. STOLTZ:

14 Q. Were there ever situations in which you or
15 others in regulatory compliance would preemptively
16 increase the limits on a customer prior to a large
17 sale or a -- for example, a promotional -- a limited
18 time promotion in order to avoid triggering the
19 algorithm?

20 MS. KOSKI: Object to form.

21 THE WITNESS: Like I said before, I can't
22 speak to any promotions. But regardless, the
23 algorithm tech would catch. So if you read over
24 what the algorithm catches, it would catch any

1 order that is out of frequency, out of the normal
2 use of business.

3 BY MR. STOLTZ:

4 Q. And those orders would automatically be held?

5 A. (Nodding head.)

6 Q. What was the turnaround for an order being
7 held? How long does it take from an order being held
8 to an order ultimately being released?

9 A. It varies.

10 MS. KOSKI: Object to form.

11 BY MR. STOLTZ:

12 Q. Was there ever, you know, a time that
13 compliance was shooting for or was there a maximum
14 amount of time it could take? I mean, it just
15 varies? It could take a year? It could take two
16 minutes?

17 A. Yes, sir.

18 Q. Wouldn't that make it difficult to do
19 business?

20 MS. KOSKI: Object to form.

21 THE WITNESS: I don't think so.

22 BY MR. STOLTZ:

23 Q. If someone ordered 100 units of opioids from
24 Anda and Anda held that for years, after awhile, that

1 they would no longer need that order, would they?

2 MS. KOSKI: Object to form.

3 THE WITNESS: I can't say.

4 BY MR. STOLTZ:

5 Q. Don't drugs have an expiration date?

6 A. Sure.

7 Q. Isn't Anda's position in the market to supply
8 customers when they are unable to find product
9 elsewhere?

10 A. If it's a legit process, right. So if it
11 hits as an order of interest, someone has to make
12 sure we want to ship on it.

13 Q. How many people would review held orders?

14 MS. KOSKI: Object to form.

15 BY MR. STOLTZ:

16 Q. How many people at Anda's responsibility was
17 to review held orders at the time that you say you
18 were dealing with reviewing suspicious orders?

19 A. Possibly up to five.

20 Q. I'm going to show you what I'm going to mark
21 as Exhibit 9, Bates Number 14 -- 141492. Just as
22 soon as I can get the sticker.

23 (Anda - Hall Exhibit 9 was marked for
24 identification.)

1 THE WITNESS: Thank you.

2 BY MR. STOLTZ:



13 MS. KOSKI: Object to form.

14 THE WITNESS: It appears that way. I'm not
15 doing the math but . . .

16 BY MR. STOLTZ:

17 Q. When you were in charge of suspicious order
18 monitoring, how long would it take you to review a
19 held order?

20 A. It would vary depending on the order.

21 Q. Could you make a guess, an average?

22 A. No. I'm sorry.

23 Q. Would it be somewhere in between an hour and
24 a day?

1 A. I don't -- I'm sorry, I don't know.

2 Q. Would it take a week?

3 A. It could. I don't know.

4 Q. Did it ever take a week?

5 A. Possibly.

6 Q. It possibly took -- would it ever take longer
7 than a week?

8 A. I'm sorry, I don't know.

9 Q. You don't recall how long it took you to
10 review a held order based on the suspicious order
11 monitoring SOP that you and others drafted and
12 reviewed every year from 2011 to 2015?

13 MS. KOSKI: Object to form. Mischaracterizes
14 testimony.

15 BY MR. STOLTZ:

16 Q. You have no idea how long this takes?

17 A. No. I'm sorry.

18 Q. Would it be possible for six individuals to
19 review 480 held orders in a day?

20 A. Possibly.

21 Q. How many would that be per person?

22 Sorry. I'll do the math.

23 MS. KOSKI: You are asking her to do the
24 math?

1 MR. STOLTZ: No, that's fine.

2 MS. KOSKI: We need one of the big
3 calculators.

4 MS. REINA: It's 80.

5 BY MR. STOLTZ:

6 Q. So it's possible that a person could review
7 80 held orders in a day?

8 A. Yes, sir.

9 Q. Okay. Did you ever review 80 held orders in
10 a day?

11 A. Possibly.

12 Q. Does that seem like an unusually large amount
13 to you?

14 A. I don't -- I really don't know.

18 Q. Do you recall whether or not in 2016 from
19 January to August if any orders were referred to the
20 DEA?

21 MS. KOSKI: Object to form.

22 THE WITNESS: I can't say. I'm sorry. I
23 wasn't really directly involved.

24 ///

1 BY MR. STOLTZ:



18 Q. And the internal system, was there a name for
19 that system?

20 A. We really called it a bucket. That was just
21 our -- what we called it but -- it was our order of
22 interest bucket.

23 Q. Okay. And if you increased -- if you had a
24 larger multiplier, you could avoid things going into

1 the bucket, right?

2 A. The larger --



11 Q. Okay. Who is in charge of setting those
12 multipliers?

13 A. I'm sorry, I don't know.

14 Q. Okay. I want to show you what I'm going to
15 mark as Exhibit 10.

16 (Anda - Hall Exhibit 10 was marked for
17 identification.)

18 MR. STOLTZ: And, again, I apologize for the
19 awkward stapling.

20 MS. KOSKI: Thank you.

21 MR. STOLTZ: Exhibit 10 bearing the Bates
22 Number 149556.

23 BY MR. STOLTZ:



3 What was Jay Spellman's position?

4 MS. KOSKI: Object to form.

5 BY MR. STOLTZ:

6 Q. What did Jay Spellman do for Anda at this
7 time?

8 A. At this time, Jay Spellman was the executive
9 director of distribution and compliance.

10 Q. And then what did Sabrina Solis do?

11 A. Sabrina is the manager of regulatory
12 compliance.

9 BY MR. STOLTZ:

10 Q. You testified earlier that the initial --
11 initially, stores would be given a thousand-unit
12 order an a particular family?

13 A. Sure.

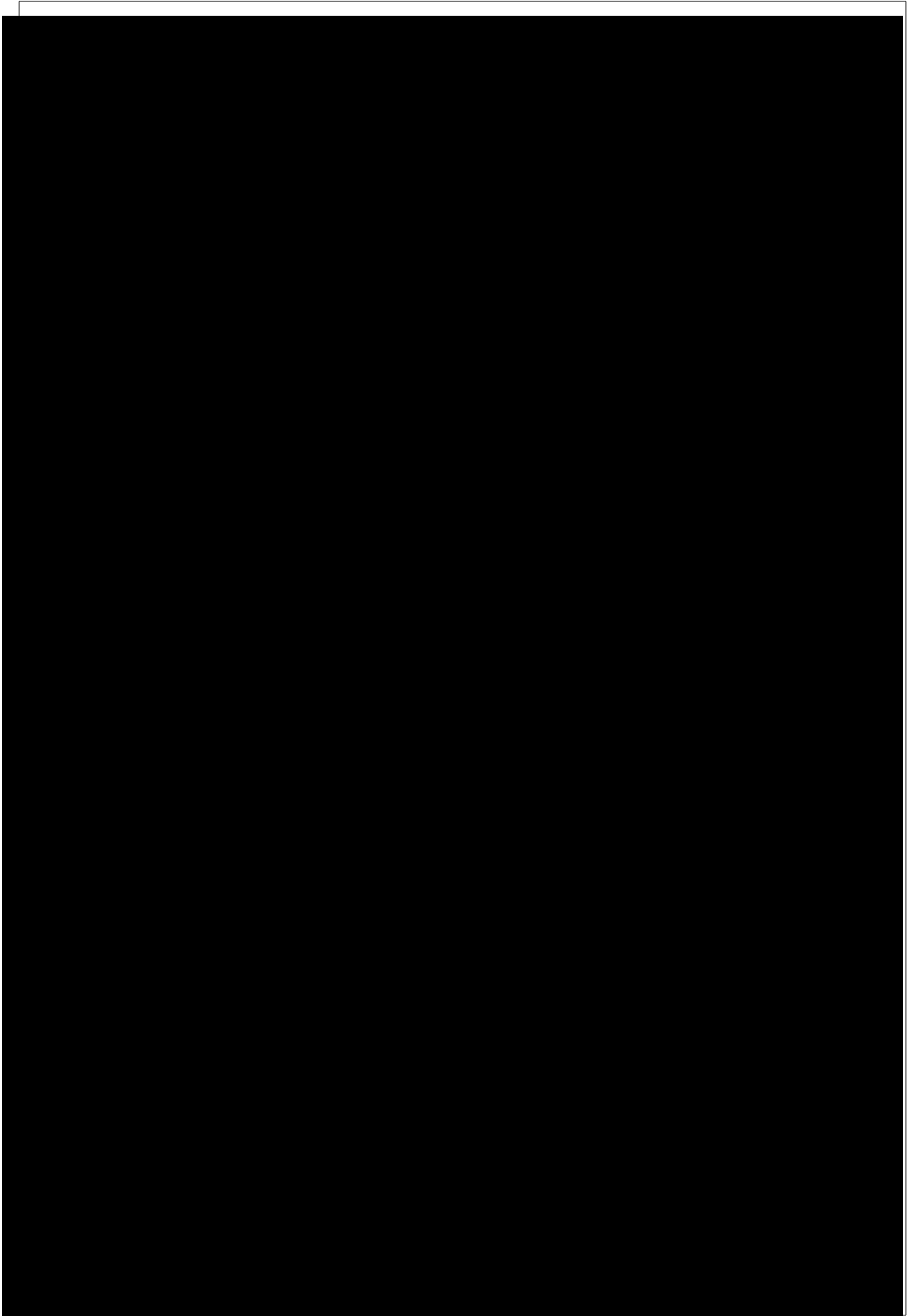
14 Q. One of those things that was outside of that
15 limit was oxycodone.

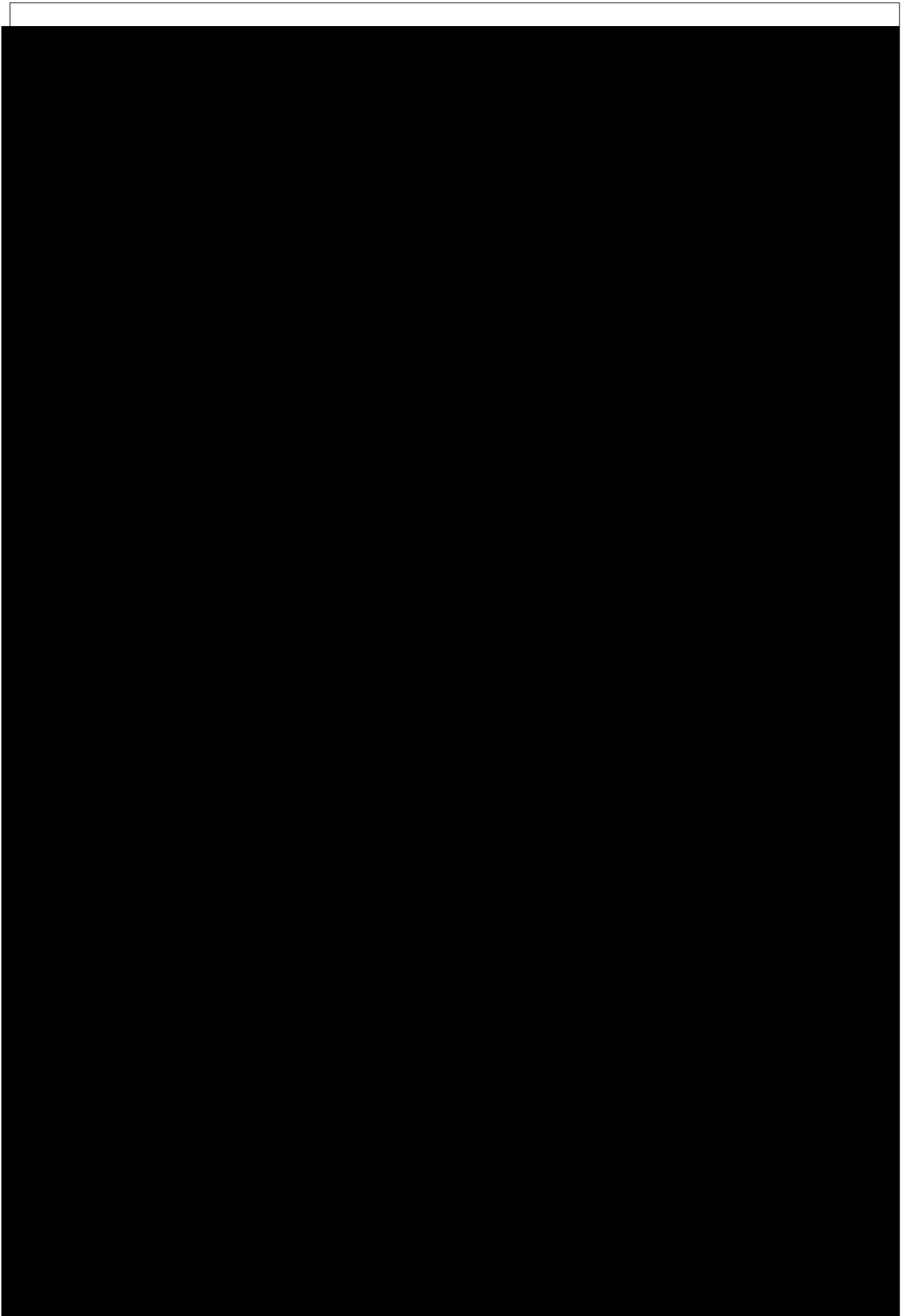
16 Is that accurate?

17 A. Yes.

18 Q. And the other thing was methadone?

19 A. Yes, sir.





1 A. As I stated before, the algorithm will still
2 catch the orders. What she is stating is she
3 reviewed the customers and everything -- and they are
4 eligible and set for this order. They have been
5 approved.

6 Q. Prior to going through the algorithm?

7 A. There's limits, and there's an algorithm.

8 Q. Did Wegmans -- did their limits ever go down
9 after this one-time purchase?

10 MS. KOSKI: Object to form.

11 BY MR. STOLTZ:

12 Q. Was there any SOP for bringing limits down
13 after a one-time purchase of a large amount of
14 opioids?

15 MS. KOSKI: Object to form.

16 THE WITNESS: I can't say for certain.

17 BY MR. STOLTZ:

18 Q. Who would have -- would you agree that if
19 limits didn't return to their number prior to a
20 limited time increase, customers could order far more
21 than they normally would have been able to in the
22 future?

23 MS. KOSKI: Object to form.

24 THE WITNESS: Can you clarify?

1 MR. STOLTZ: Sure.

2 BY MR. STOLTZ:



20 BY MR. STOLTZ:

21 Q. So you would be comfortable increasing limits
22 indefinitely after the review of a one-time large
23 purchase of a controlled substance?

24 MS. KOSKI: Object to form. Mischaracterizes

1 testimony.

2 BY MR. STOLTZ:



14 Q. Was there ever a time that limits were
15 re-reviewed? For example, you looked at the SOP
16 policy in general on a yearly basis. Would limits
17 themselves ever be reviewed after they were set?

18 MS. KOSKI: Object to form.

19 THE WITNESS: Possibly.

20 BY MR. STOLTZ:

21 Q. In the time that you were in charge of
22 suspicious order monitoring, whether that was after
23 Robert Brown being laid off or prior to his hiring,
24 were limits ever reviewed after they were set?

1 A. Possibly. I can't say for a specific case.

2 Q. But there was never any policy to do so?

3 MS. KOSKI: Object to form.

4 THE WITNESS: Specifically reviewing the
5 customer in general.

6 So, as I stated before, the whole picture of
7 the customer, re-reviewing them, making sure --
8 someone the size of a Wegmans, re-reviewing and
9 making sure we are comfortable with where they
10 stand.

11 BY MR. STOLTZ:

12 Q. Were customers ever re-reviewed -- was there
13 ever a specific policy that you can recall to
14 re-review customers in situations other than where
15 they are asking for an increase in their control
16 limit?

17 MS. KOSKI: Object to form.

18 THE WITNESS: I can't say for certain.

19 BY MR. STOLTZ:

20 Q. So that you know of, there was no policy to
21 do so?

22 MS. KOSKI: Object to form.

23 THE WITNESS: I can't say for certain.

24 ///

1 BY MR. STOLTZ:

2 Q. It was -- you were running the department
3 prior to Robert Brown being hired and then after him
4 being laid off?

5 MS. KOSKI: Object to form. Mischaracterizes
6 testimony.

7 BY MR. STOLTZ:

8 Q. Were you in charge of suspicious order
9 monitoring when Robert Brown was not with Anda?

10 A. Yes.

11 Q. While you were in charge of that, of
12 suspicious order monitoring, did you ever implement a
13 policy to review limits in situations other than
14 where a customer's asking for an increase in limits?

15 A. We reviewed -- re-reviewed customers, yes.

16 Q. I understand that you re-reviewed customers.

17 Did -- was there a policy that you can recall
18 to re-review customers in situations other than where
19 they were asking for an increase in limits? And if
20 there was a policy, can you let me know what that
21 policy was?

22 MS. KOSKI: Object to form.

23 THE WITNESS: A written policy? Is that what
24 you're --

1 BY MR. STOLTZ:

2 Q. I don't know.

3 A. I guess --

4 Q. Maybe you wrote it down or -- I'm just asking
5 you how you ran your department.

6 Did you ever instruct anyone, written or
7 otherwise, to re-review customers in situations where
8 they were not asking for an increase in controlled
9 substances?

10 A. Possibly.

11 Q. Possibly?

12 A. Yes, sir.

13 Q. Can you think of a reason why you might
14 possibly do that?

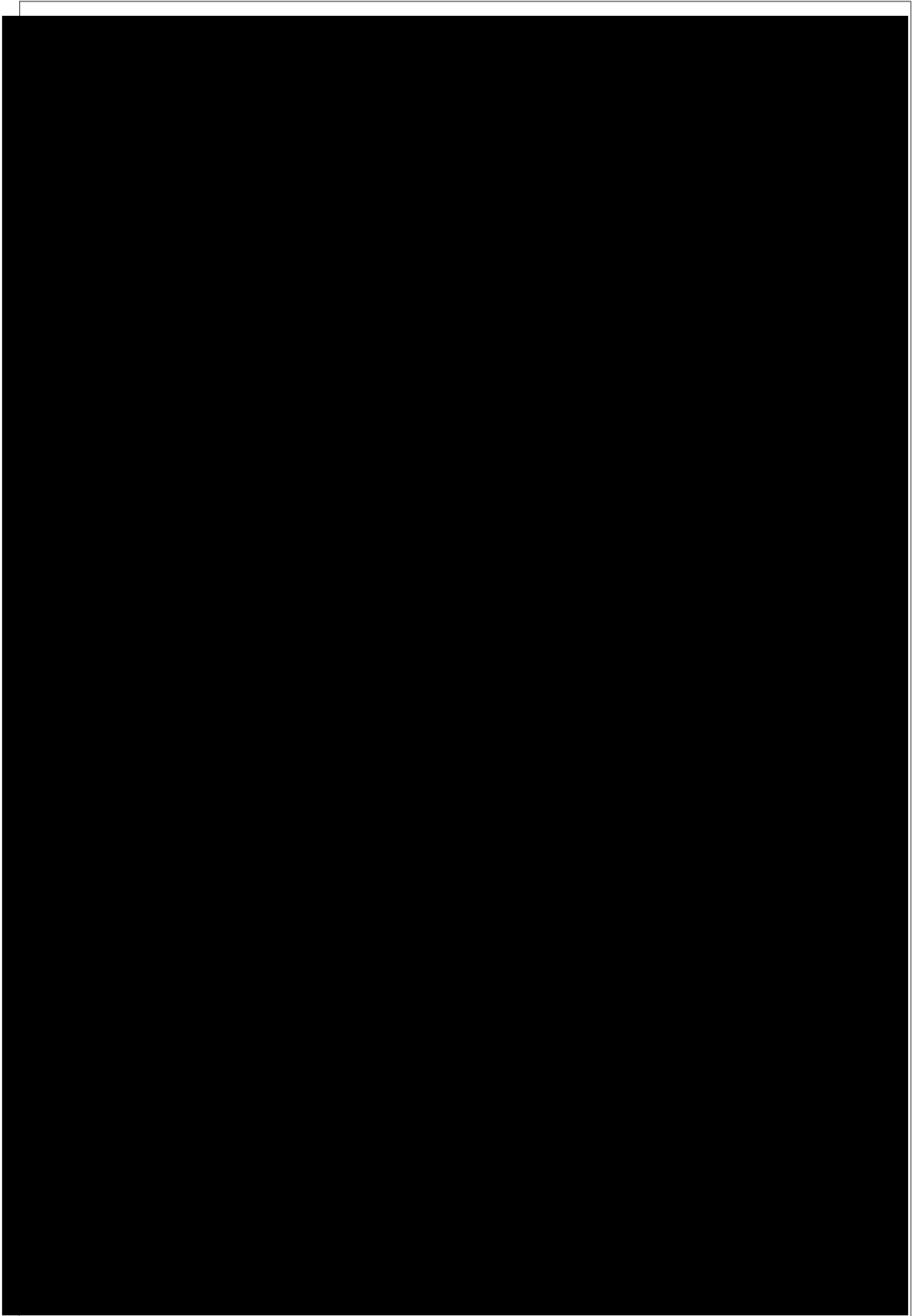
15 A. I can't say for certain.

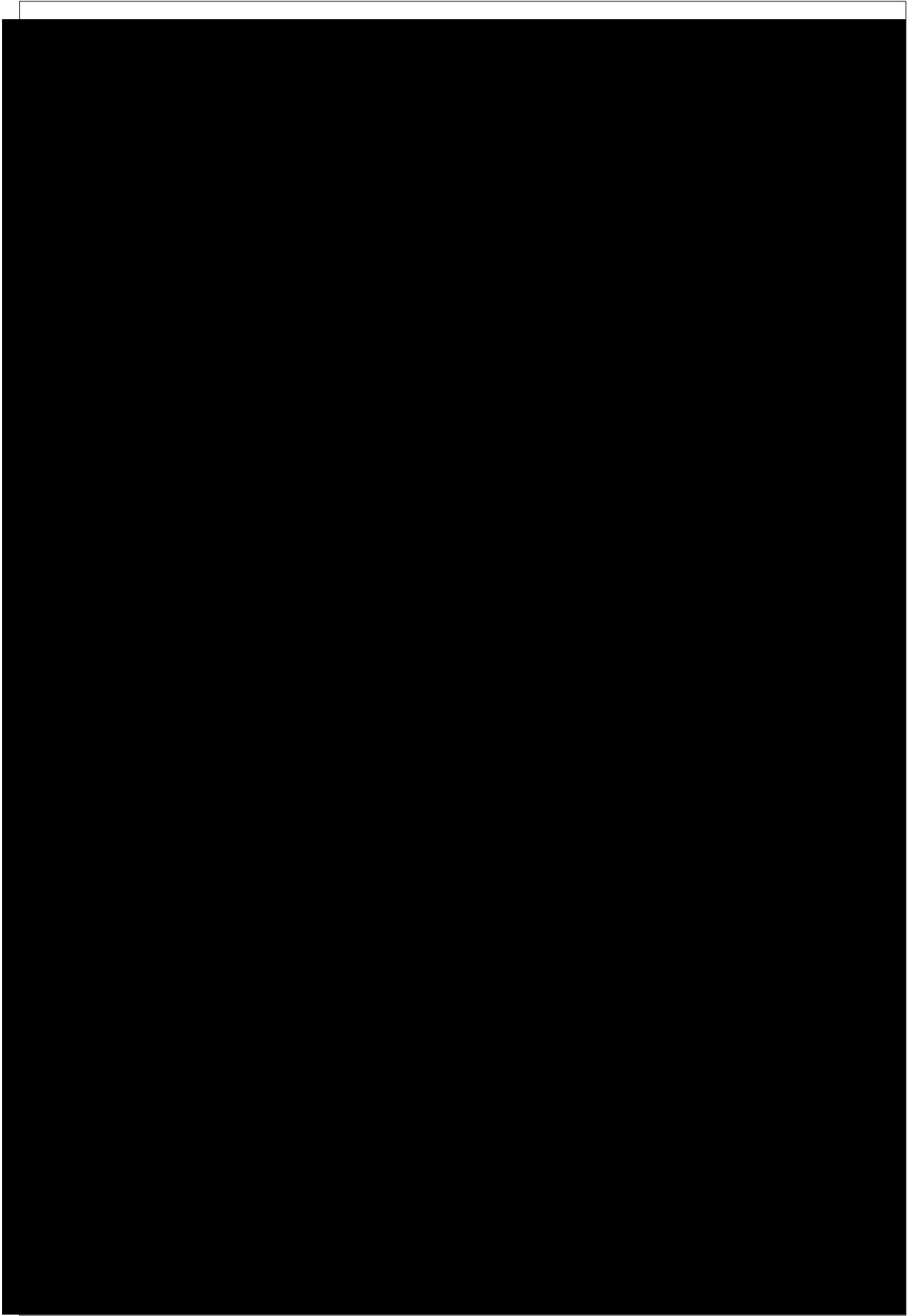
16 (Anda - Hall Exhibit 11 was marked for
17 identification.)

18 BY MR. STOLTZ:

19 Q. I'm showing you what's been marked as
20 Exhibit 11, bearing the Bates number --

21 MS. KOSKI: Thank you.





15 MS. KOSKI: Object to form.

16 BY MR. STOLTZ:

17 Q. Do you know when Anda made the transition to
18 reporting suspicious orders as opposed to suspicious
19 customers?

20 MS. KOSKI: Object to form.

21 THE WITNESS: No.

22 BY MR. STOLTZ:

23 Q. Do -- was it a decision that you made or was
24 it a decision that Robert Brown made?

1 A. It was a decision somebody else made. I did
2 not make it.

3 Q. So it was at least after Robert Brown was
4 hired and you transitioned to just focusing on
5 licensures?

6 MS. KOSKI: Object to form.

7 THE WITNESS: Possibly.

8 BY MR. STOLTZ:

9 Q. Well, if you didn't make the decision, then
10 necessarily it would have occurred after you were out
11 of the loop as far as suspicious order monitoring
12 goes, right?

13 A. Possibly, yes.

14 Q. And when was that again?

15 A. I was in that role 2010 to maybe 2012.

20 Q. Well, at this point, you're still in charge
21 of suspicious order monitoring, right?

22 MS. KOSKI: Object to form.

23 THE WITNESS: It was around that time that
24 Robert transitioned in, in 2012. I don't know

1 the exact --

2 MR. STOLTZ: Okay.

3 BY MR. STOLTZ:

4 Q. So at least up until November of 2012 Anda
5 was reporting suspicious customers and not suspicious
6 orders?

7 A. Yes, sir.

8 THE VIDEOGRAPHER: Off the video record at
9 2:27.

10 (Recess from 2:27 until 2:33 p.m.)

11 THE VIDEOGRAPHER: The time is 2:33 p.m. We
12 are now back on the record.

13 BY MR. STOLTZ:

14 Q. So during the whole time that you were at
15 Anda, the main focus of your employment -- at least
16 one of your main responsibilities was focused around
17 licensing, right?

18 A. Yes, sir.

19 Q. And that would entail making sure that the
20 customers had valid licenses to purchase
21 pharmaceuticals, right?

22 A. Yes, sir.

23 Q. And each state is a little bit different?

24 A. For controlled substance?

1 Q. For any type of licensing.

2 A. Yes, sir.

3 Q. When it comes to controlled substances, are
4 states different?

5 A. Some states have a controlled substance
6 license and some states do not.

7 Q. Okay. So I guess some states kind of track
8 the federal rules and other states don't?

9 MS. KOSKI: Object to form.

10 BY MR. STOLTZ:

11 Q. Would part of -- part of understanding
12 licensure wouldn't just be limited to the states,
13 right? It would also be limited -- it would also
14 extend to requirements under the federal regulations
15 and federal code?

16 A. Yes, sir.

17 Q. And you mentioned that -- about how
18 frequently would -- are there separate licenses for
19 controlled substances and noncontrolled substances?

20 A. In each state, it varies. So each state has
21 different requirements.

22 Q. As to federal law, is there a different
23 license for controlled substances and noncontrolled?

24 A. Federal is your DEA registration.

1 Q. Okay. It's the DEA registration?

2 A. Yes, sir.

3 Q. And what type of information can you tell
4 from a DEA registration?

5 A. The DEA registration has the name, the
6 address, the schedules that they're approved for as
7 well as expiration date, how much they paid for their
8 registration, and when it was issued.

9 Q. There's a situation where you could -- maybe
10 a facility's DEA registration was out of date or
11 their DEA registration put them in a category of
12 customer that Anda didn't want to sell to, or at
13 least policy-wise didn't want to sell to.

14 Could Anda, for example, substitute in one of
15 the practitioner's DEA registration and sell product
16 directly to that individual in order to get product
17 to the customer that's DEA registration may have been
18 out of date?

19 MS. KOSKI: Object to form.

20 THE WITNESS: No, I'm not -- I'm sorry. I'm
21 not sure --

22 MR. STOLTZ: Sure. That was a terrible
23 question.

24 ///

1 BY MR. STOLTZ:

2 Q. So doctors have DEA registrations, right?

3 Not all of them but some?

4 A. Yes, sir.

5 Q. And a pharmacy would have a DEA registration?

6 A. Yes, sir.

7 Q. Assuming, if they wanted one.

8 What are some of the other classes of
9 entities that can have a DEA registration?

10 A. Anyone that is going to handle controlled
11 substances is required to have a DEA registration.

12 Q. Okay. If a pharmacist's DEA registration was
13 out of -- would a pharmacist himself or herself would
14 they have a DEA registration?

15 A. No. The pharmacy would have it.

16 Q. Okay. What about -- what about a clinic or a
17 hospital? Would the doctor have a DEA registration
18 in addition to the hospital having a DEA
19 registration?

20 A. Not -- a clinic and hospitals would be two
21 different classifications. Some clinics won't have
22 their own licensure, and they would rely on the
23 physician. And hospitals -- typically a hospital has
24 their own DEA registration.

1 Q. Okay. But there could be situations in
2 which -- well, there would be situations in which,
3 you know, a hospital would have a DEA registration
4 and doctors within that hospital would have a DEA
5 registration?

6 MS. KOSKI: Object to form.

7 BY MR. STOLTZ:

8 Q. Could you sort of have overlapping DEA
9 registrations is what I'm asking?

10 MS. KOSKI: Object to form.

11 THE WITNESS: The DEA can issue multiple DEA
12 registrations at the same address for different
13 people or different entities.

14 BY MR. STOLTZ:

15 Q. Okay. So then if you wanted to -- if you
16 wanted to avoid scrutiny for selling opioids to a
17 hospital or a clinic that had a DEA registration,
18 couldn't you use the doctor that works there's DEA
19 registration and sell to them directly as opposed to
20 that clinic?

21 MS. KOSKI: Object to form.

22 THE WITNESS: Can you please clarify?

23 BY MR. STOLTZ:

24 Q. In situations where there are more than one

1 DEA registration at one location -- and that's
2 something that's possible, right?

3 A. Yes, sir.

4 Q. Okay. In situations where there are two --
5 more than one DEA registration at one location, would
6 it be possible to avoid DEA scrutiny by selling to
7 one and not the other?

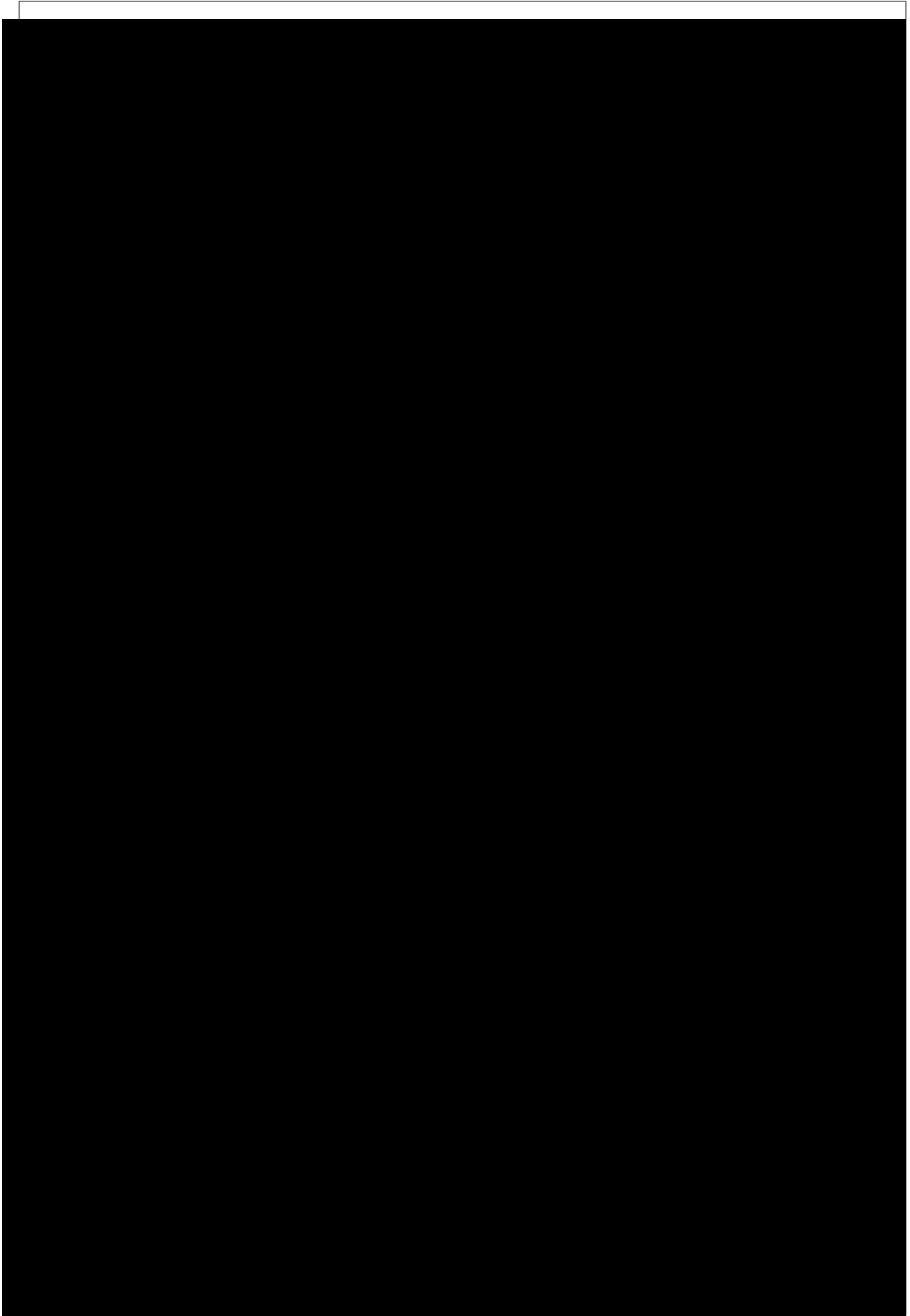
8 MS. KOSKI: Object to form.

9 THE WITNESS: It just depends on who's our
10 customer. I'm still not sure -- I'm unclear on
11 what your question is.

12 MR. STOLTZ: I'm marking Exhibit 12, Bates
13 Number 136972.

14 (Anda - Hall Exhibit 12 was marked for
15 identification.)

16 BY MR. STOLTZ:



10 BY MR. STOLTZ:

11 Q. Well, it is.

12 But regardless, a DEA registration, is that
13 going to be required for all types of -- all types of
14 pharmaceuticals or just controlled substances?

15 MS. KOSKI: Object to form.

16 BY MR. STOLTZ:

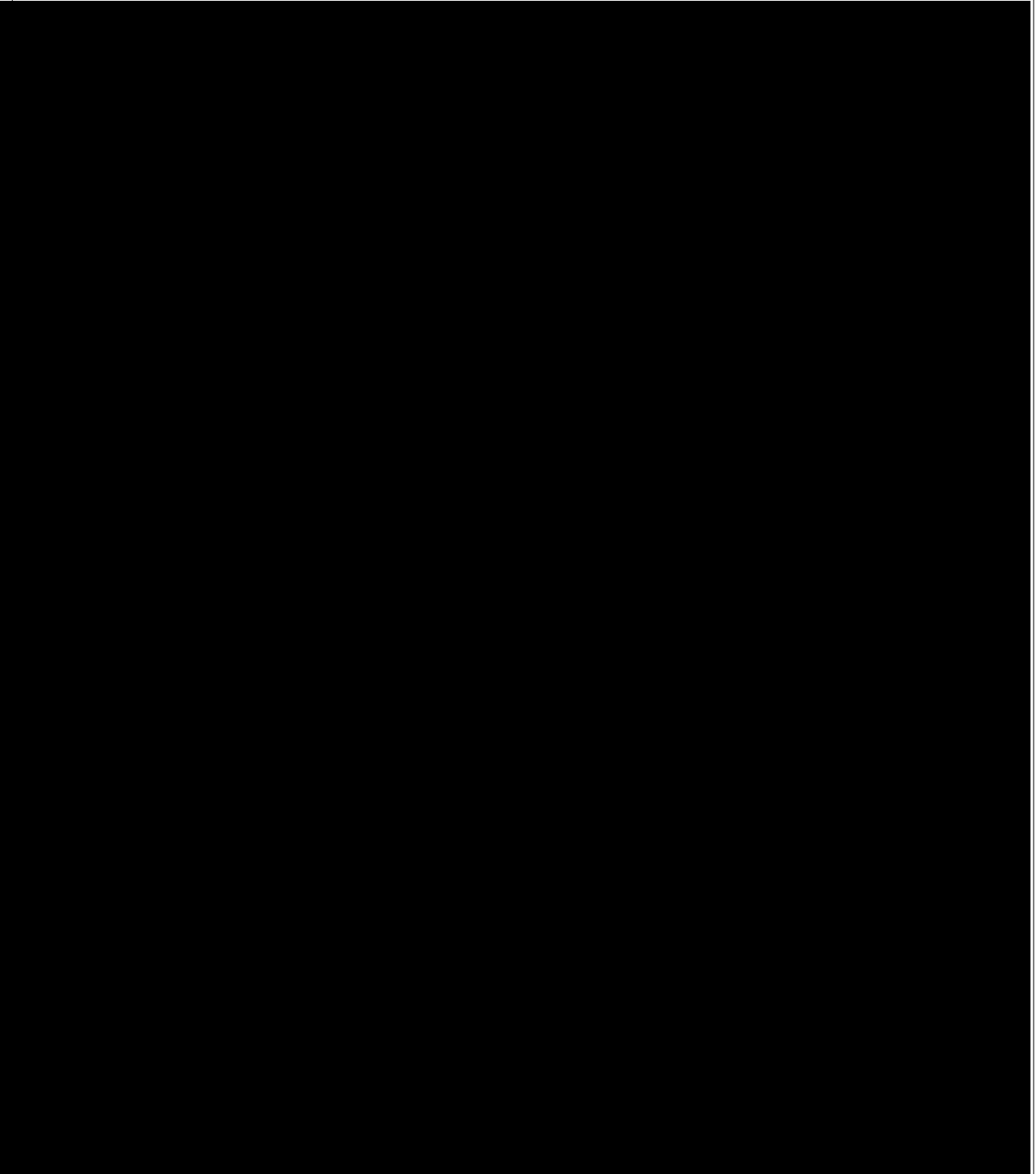
17 Q. A DEA registration is required for ordering
18 controlled substances, right?

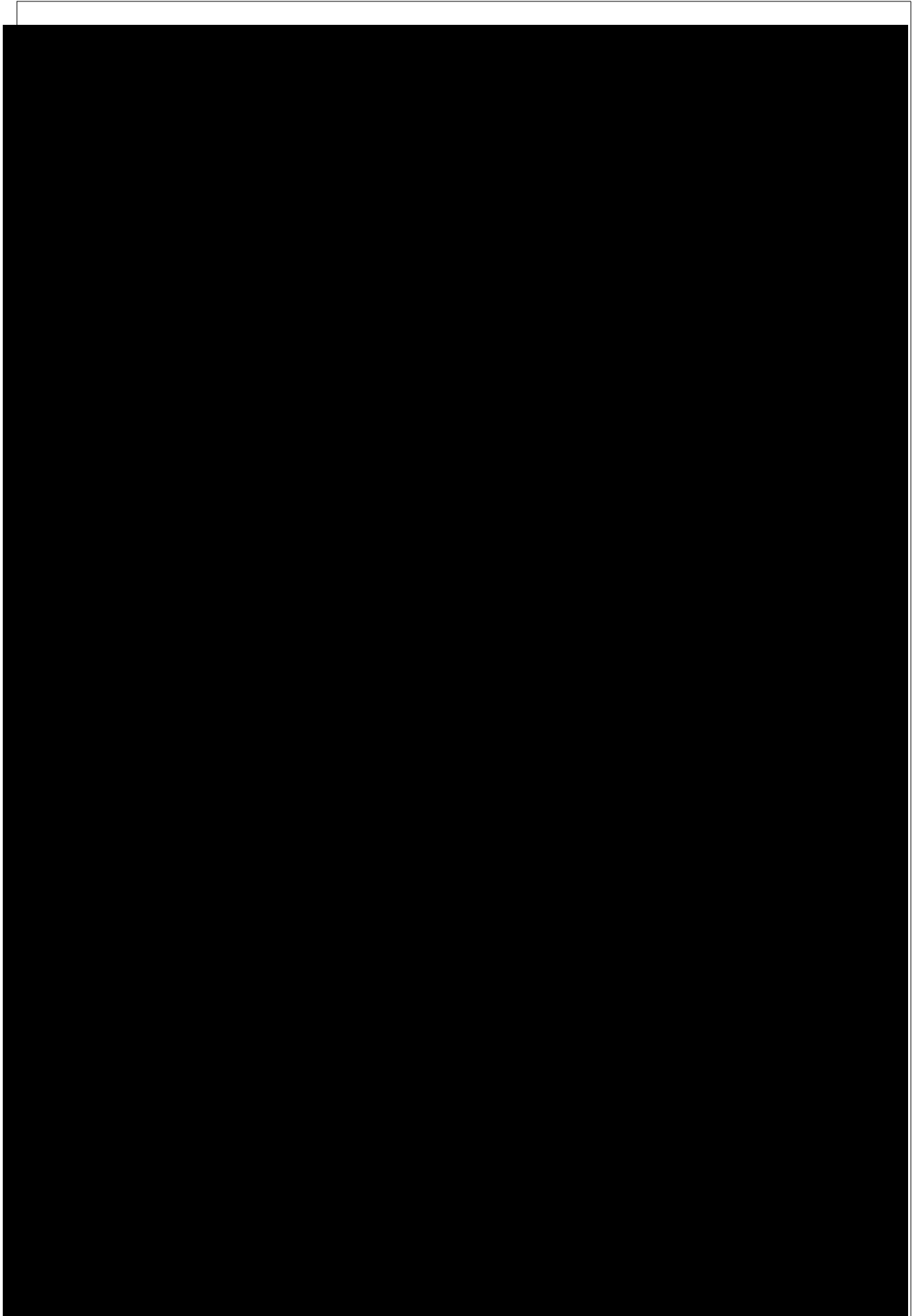
19 A. For the -- yes.

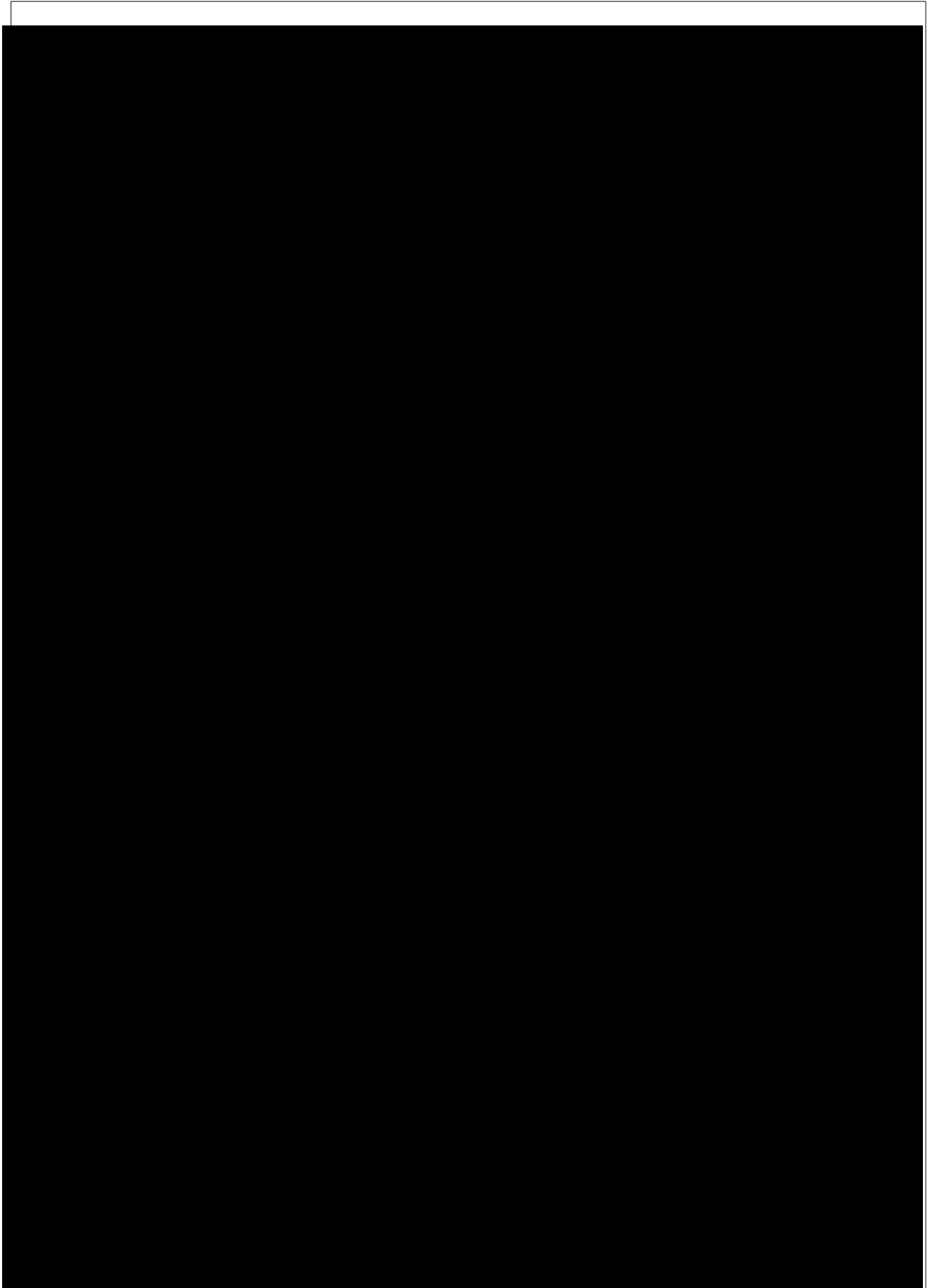
20 Q. Would you need a DEA registration to order
21 Tylenol?

22 A. In our system, we -- as a new customer or an
23 existing customer, we try and have all of their
24 licensure on file. And some of that is for

1 chargeback reasons. So the DEA is their -- the link,
2 the notifier, when things get sent back for
3 chargeback. Not necessarily a controlled substance
4 buying customer or a controlled substance order; just
5 account maintenance.







24 Q. Did Anda have a policy of not distributing

1 controlled substances to clinics?

2 MS. KOSKI: Object to form. Mischaracterizes
3 the document.

4 BY MR. STOLTZ:

5 Q. When you were in charge of suspicious order
6 monitoring, which would have been in February of
7 2012, did you or did anyone else in regulatory -- the
8 regulatory department implement a policy of not
9 distributing controlled substances to clinics?

10 A. Pain clinics.

11 Q. This was a pain clinic?

12 A. I can't say for certain.

13 Q. When was that implemented, that policy?

14 A. June 2010-ish. I'm not a hundred percent
15 certain.

16 Q. Were you a part of those conversations, or
17 that's just what you heard?

18 MS. KOSKI: Object to form.

19 THE WITNESS: Can you please clarify?

20 MR. STOLTZ: Sure.

21 BY MR. STOLTZ:

22 Q. When that decision was made -- you seem to
23 have a specific understanding of when that decision
24 was made.

1 Do you know why that decision was made?

2 A. To discontinue the sale of controlled
3 substances to pain clinics.

4 Q. And why was that policy implemented?

5 MS. KOSKI: Object to form.

6 THE WITNESS: I can't say for certain.

7 BY MR. STOLTZ:

8 Q. Why do you remember that it was in June of
9 2010? Is there anything else that happened in June
10 of 2010?

11 A. June -- the reason I remember is in June 2010
12 is because our physicians were -- there was
13 expirations that occurred on that day. So when I see
14 a customer, I can see that date of an expiration.

15 Q. What do you mean an expiration?

16 A. Expiration date on one of their licensure.

17 Q. Oh.

18 A. Sorry, it was one of those where you join
19 things.

20 Q. So it was after -- I guess after June of
21 2010, that's when Anda was no longer going to
22 distribute to pain clinics?

23 A. Pain clinics, yeah. I believe it was 2010,
24 that decision, but . . .

1 Q. But it didn't have a similar policy with
2 regards to physician in charges, or did it?

3 MS. KOSKI: Object to form.

4 BY MR. STOLTZ:

5 Q. Did Anda continue to distribute controlled
6 substances to pain clinics by sending those --
7 sending those pills to the physician in charge by
8 using their DEA registration?

9 MS. KOSKI: Object to form.

10 THE WITNESS: No, sir, not that I'm aware of.

11 BY MR. STOLTZ:

12 Q. How long after 2010 did Anda continue to
13 distribute pain pills to pain clinics?

14 MS. KOSKI: Object to form.

15 BY MR. STOLTZ:



21 BY MR. STOLTZ:

22 Q. What are some other reasons why Anda would
23 not be allowed to sell controlled substances to a
24 type of license in 2012?

1 MS. KOSKI: Object to form. Foundation.

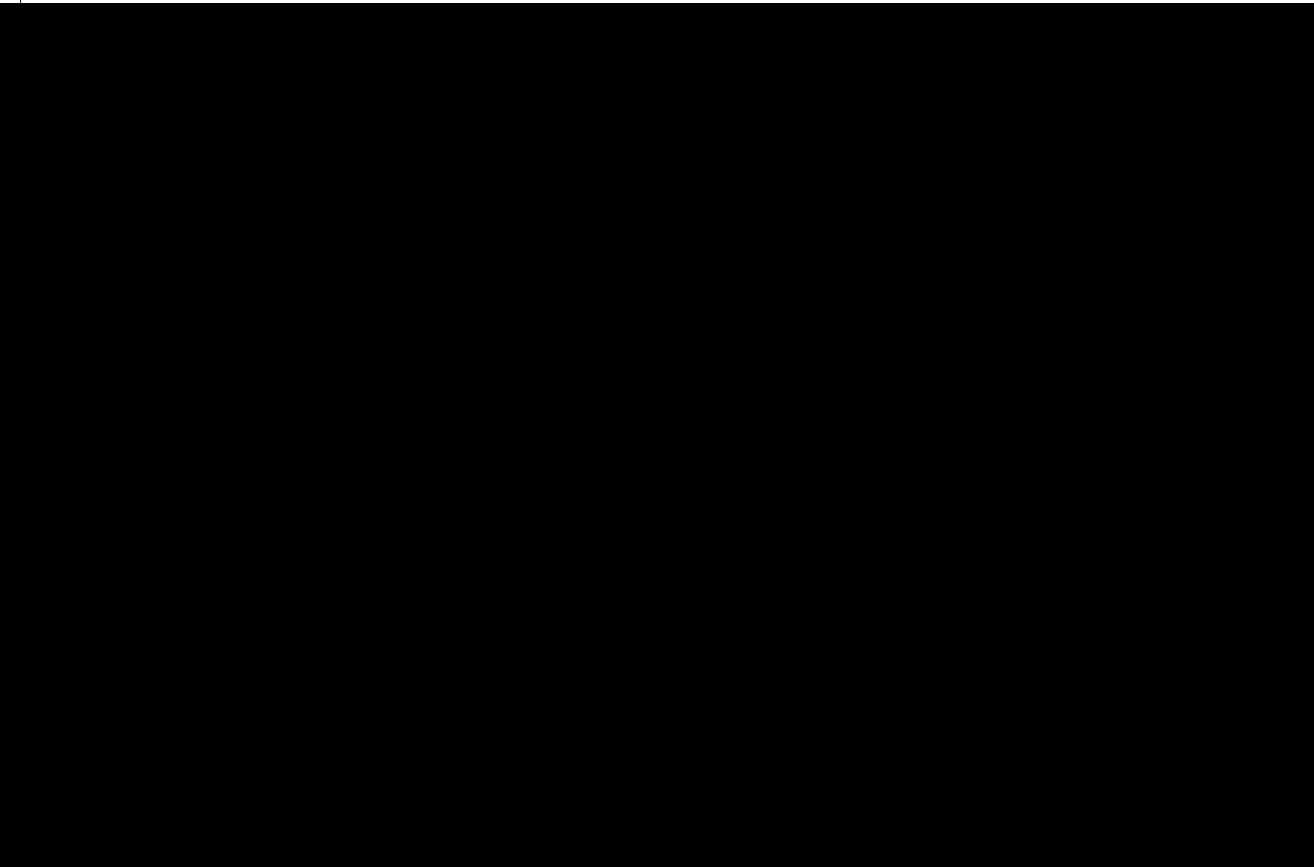
2 BY MR. STOLTZ:

3 Q. What -- what is required as far as licenses
4 before -- what licenses are required before someone
5 can order controlled substances?

6 A. State license; if their state requires a
7 controlled substance, a controlled substance license;
8 and a DEA registration.

9 Q. And -- and what types of licenses is Anda not
10 allowed to distribute controlled substances to in
11 2012?

12 A. There was a decision made to not sell to
13 wholesalers and pain clinics.





1 Q. Weren't you the -- in charge of licensure?

2 A. Sure.

3 Q. Wasn't that one of your main
4 responsibilities?

5 A. Yes, sir.

6 Q. And that was your main -- one of your main
7 responsibilities in February of 2012?

8 A. Licensure, yes.

9 Q. And as part of that, your job was to ensure
10 that you were allowed -- and part of that would be
11 knowing what licenses you are allowed to sell to,
12 right?

13 A. Yes, sir.

14 Q. So in February of 2012, what licenses were
15 you not allowed to sell to?

16 MS. KOSKI: Object to form.

17 BY MR. STOLTZ:

18 Q. You don't know?

19 A. Pain clinics and wholesalers.

20 Q. Are those the only two type of licenses?

21 A. Those are the two I remember for that time
22 frame.

23 Q. Okay. Was that a self-imposed rule?

24 A. Can you please clarify?

1 Q. When I asked "What licenses are you not
2 allowed to sell to," was that a self-imposed
3 limitation? Did Anda put those limitations on itself
4 or was that a requirement by state or federal
5 regulations?

6 A. That was an Anda decision.

7 Q. Are there some states that have a rule as to
8 licenses that can be sold to by a wholesaler?

9 A. Not that I'm aware of, sir.

3 BY MR. STOLTZ:

4 Q. So what was that internal system called? I
5 mean, how could you sort of monitor the tasks or
6 whatever for a particular customer?

7 A. I believe you are referring to Remedy.

8 Q. Okay. That would be what I'm referring to.

9 So a system like Remedy, is that where you go
10 to see whether a customer had been denied, met their
11 limit for a certain month, that sort of thing?

12 A. Remedy is more task-oriented. So a rep will
13 send a request to a specific department asking for,
14 hey, please update the phone number, update the
15 address. That's a task.

16 Q. If a -- if a customer or an order was
17 reported to the DEA, where -- where would that show
18 up? Would that also be on Remedy or on a different
19 electronic system?

20 A. It would be in the Excel file called
21 "Customer Cutoff." That's where those are captured.

22 Q. And would that -- would that information ever
23 be put into Remedy or T PS or the O drive?

24 A. TPS. In the notes section of TPS. You know,

1 it would vary that they would have a note saying the
2 customer was cut off. Most of the time, it would.

3 Q. And but then would it also include a note
4 whether or not a customer was ultimately reported to
5 the DEA?

6 MS. KOSKI: Object to form.

7 BY MR. STOLTZ:

8 Q. Where -- where -- where in Anda's internal
9 systems, electronic or otherwise, would -- would a
10 customer's -- a customer getting reported to the DEA,
11 where would that be reflected?

12 A. In that Excel file with the -- Customer
13 Cutoff file.

14 Q. So that wouldn't make it into the notes of a
15 due diligence file or TPS or --

16 A. Possibly.

17 Q. Possibly but not all the time?

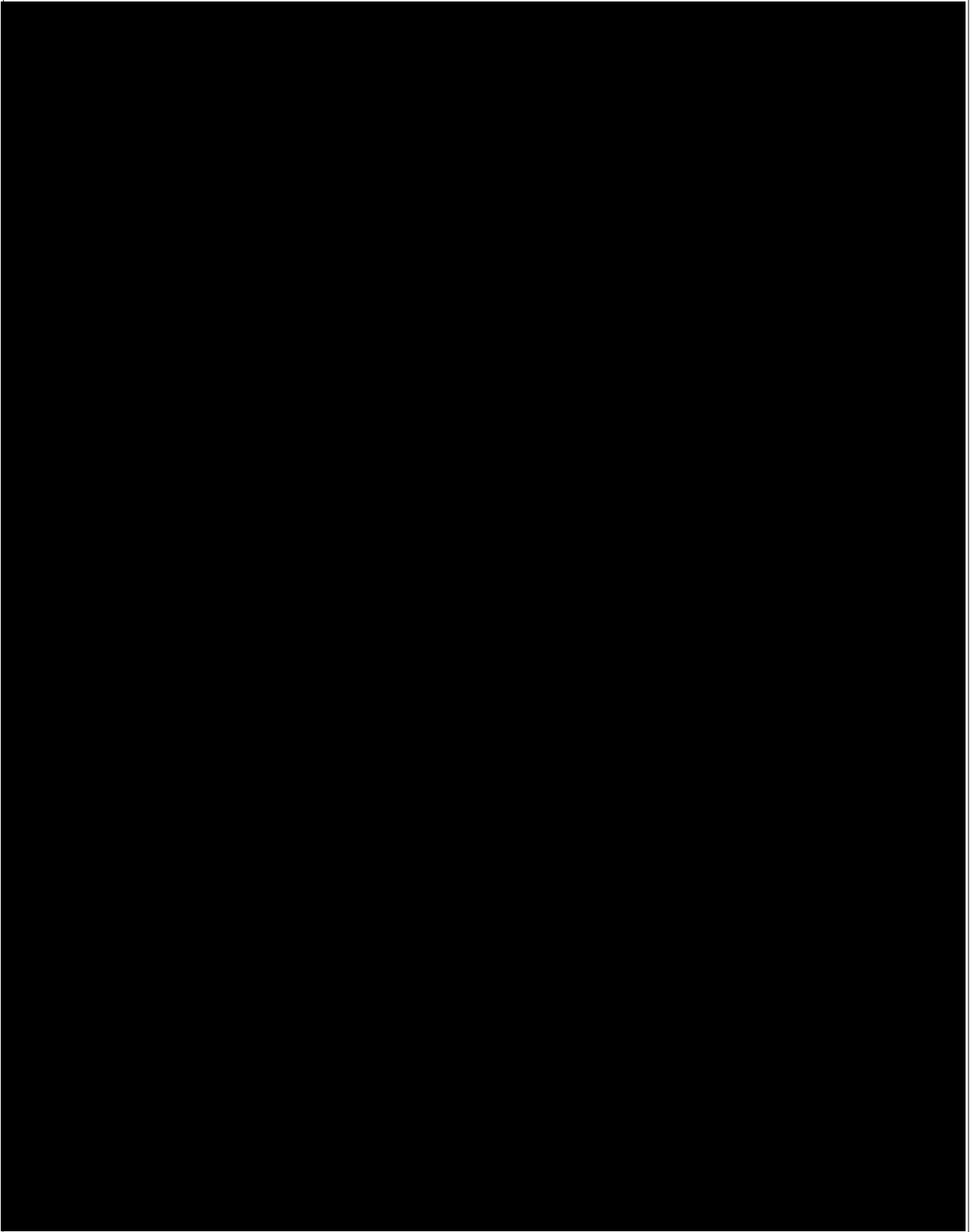
18 A. I can't say a hundred percent of the time.

19 MR. STOLTZ: I'm going to show you what I'm
20 marking as Exhibit 13, Bates number 81549, and
21 its attachment, 81550.

22 (Anda - Hall Exhibit 13 was marked for
23 identification.)

24 MS. KOSKI: Do you have another copy for her?

1 MR. STOLTZ: Oh, of course. Sorry about
2 that.
3 BY MR. STOLTZ:



6 BY MR. STOLTZ:

7 Q. Were you able -- being in charge of
8 suspicious order monitoring, at least during this
9 time period, were you ever aware of what other
10 distributors were doing with respect to suspicious
11 order monitoring?

12 A. No, not me specifically.

13 Q. Would someone at Anda be aware of what other
14 distributors were doing with respect to suspicious
15 order monitoring?

16 A. I can't say for certain.

17 Q. Do you think Sabrina Solis would know?

18 A. I can't say for certain.

19 Q. You mentioned earlier that part of knowing
20 your customer was knowing who their primary
21 distributor was.

22 Is that accurate?

23 A. Yes, sir.

24 Q. And would that also include knowing how that

1 primary distributor monitors that shared customer for
2 suspicious orders?

3 A. Me specifically?

4 Q. If you wanted to know your customer and part
5 of that included knowing who their primary
6 distributor was, would that also include knowing how
7 that primary distributor monitored that shared
8 customer for suspicious orders?

9 A. No.

10 MS. KOSKI: Object to form.

11 THE WITNESS: No, sir.

12 BY MR. STOLTZ:

13 Q. Would a primary distributor ever share with
14 Anda dispensing data?

15 MS. KOSKI: Object to form.

16 MS. VAN TASSELL: This is Rebecca Van Tasell.

17 Object to form.

18 BY MR. STOLTZ:

19 Q. While you were in charge of regulatory
20 compliance and suspicious order monitoring, that
21 included knowing a customer, right?

22 A. Yes, sir.

23 Q. And part of knowing your customer was knowing
24 the primary distributor for that customer?

1 A. Yes, sir.

2 Q. Other than just in general knowing a
3 customer, how would a primary distributor -- how
4 would -- how would who the primary distributor is
5 matter with regards to monitoring suspicious order
6 monitoring?

7 MS. KOSKI: Object to form.

8 MS. CARDENAS: Object to form.

9 THE WITNESS: Can you please clarify?

10 MR. STOLTZ: Sure.

11 BY MR. STOLTZ:

12 Q. How is a primary distributor relevant to
13 monitoring for suspicious orders?

14 MS. CARDENAS: Object to form.

15 THE WITNESS: As I stated earlier, just
16 knowing your customer, knowing who they are doing
17 business with.

18 BY MR. STOLTZ:

19 Q. Right.

20 Obviously, there's knowing who they are doing
21 business with, but how does that relate to monitoring
22 for suspicious orders? How -- in what way would that
23 empower Anda to more effectively monitor for
24 suspicious orders?

1 MS. CARDENAS: Object to form.

2 THE WITNESS: It's just a field. It's an
3 understanding of who they are doing business
4 with.

5 BY MR. STOLTZ:

6 Q. Do you think it would be easier to monitor
7 for suspicious orders if you knew how much the
8 primary distributor was distributing to that shared
9 customer?

10 MS. VAN TASSELL: Object to form.

11 MS. KOSKI: Object to form.

12 THE WITNESS: There's people from the ceiling
13 talking.

14 Sorry.

15 Can you please clarify?

16 BY MR. STOLTZ:

17 Q. Would you agree that it was difficult to know
18 your customer without having -- without knowing
19 exactly how much the primary distributor was
20 dispensing to them?

21 MS. CARDENAS: Object to form.

22 THE WITNESS: I don't think "difficult" is
23 the appropriate word.

24 ///

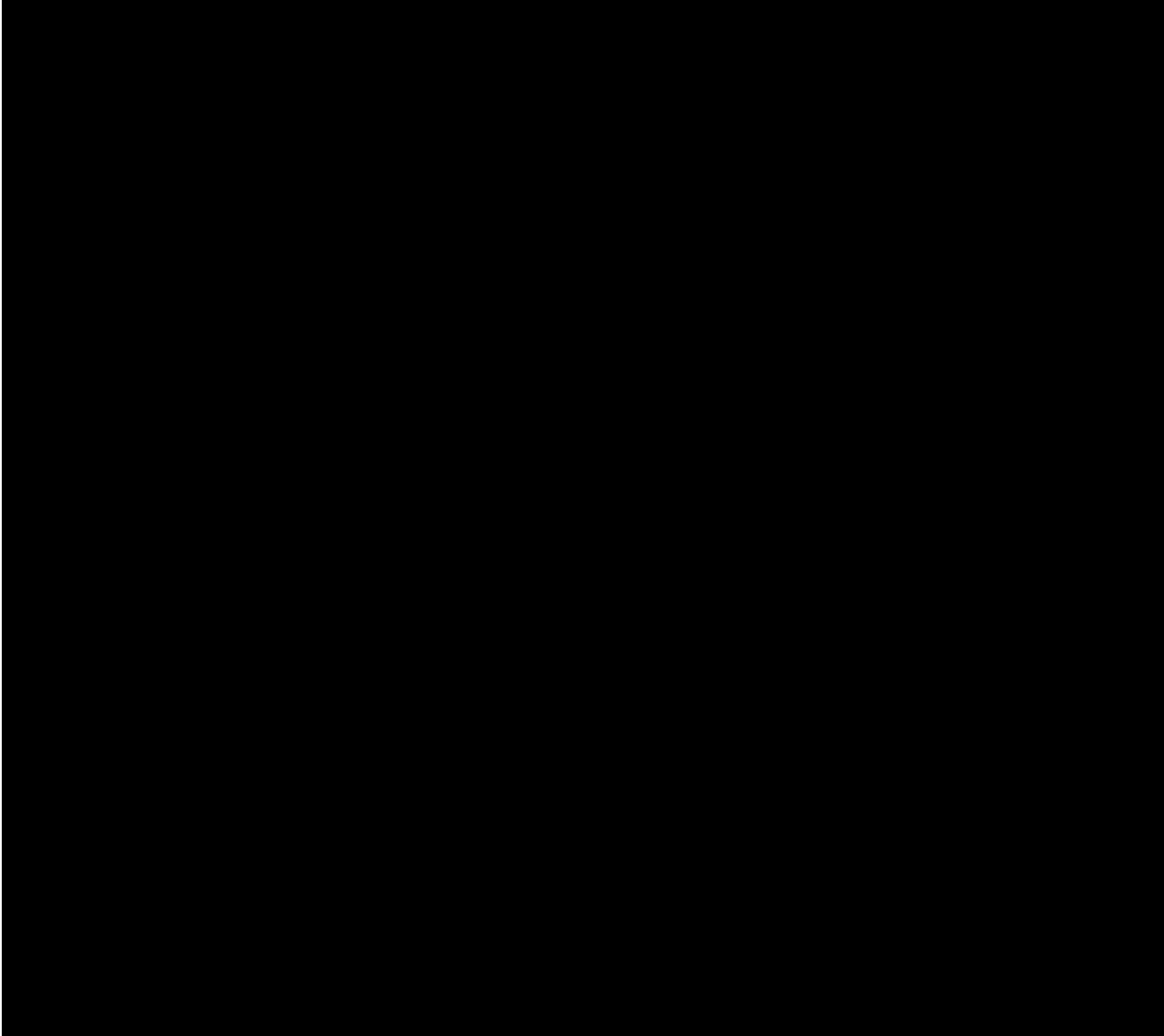
1 BY MR. STOLTZ:

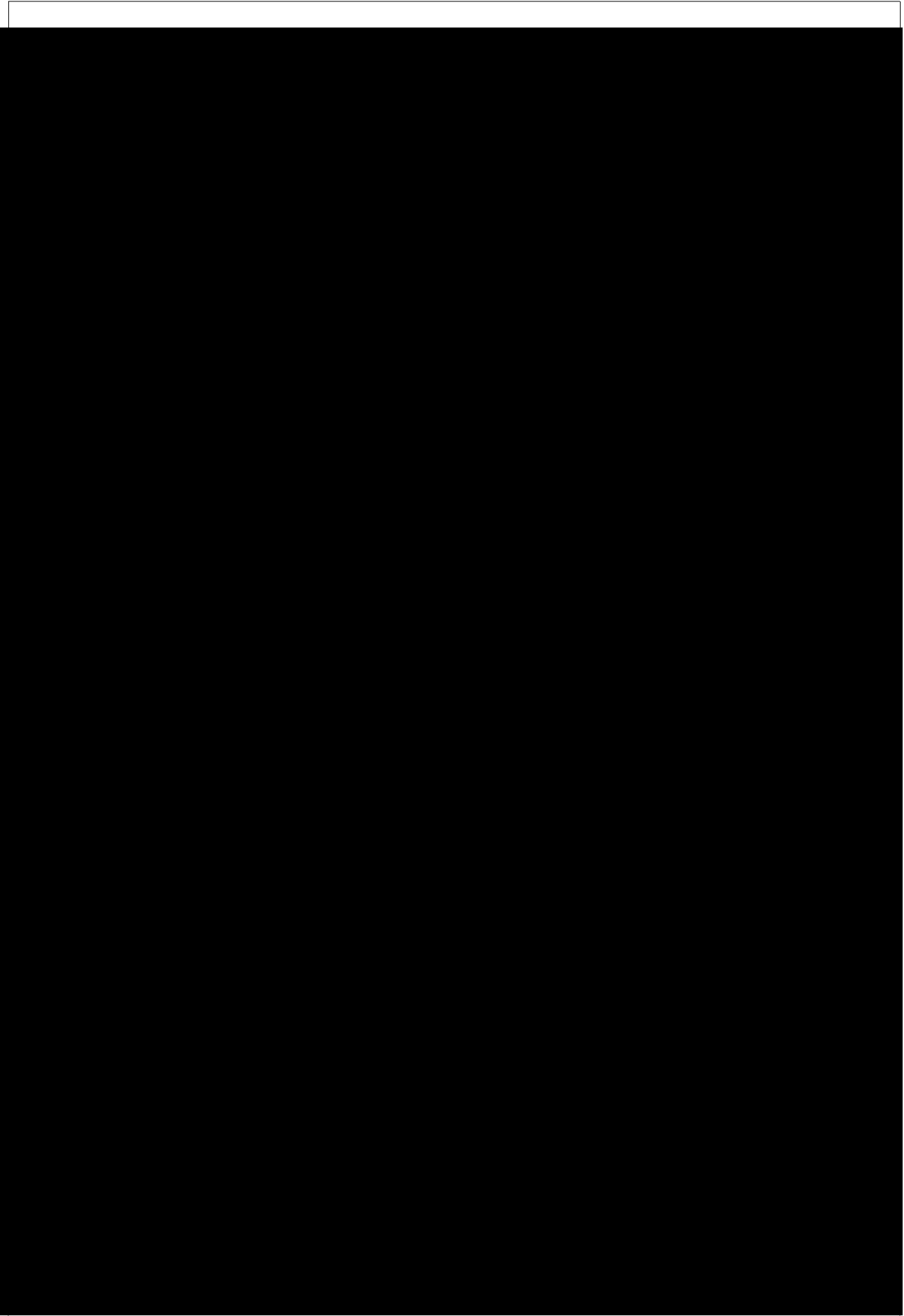
2 Q. And what word would you use?

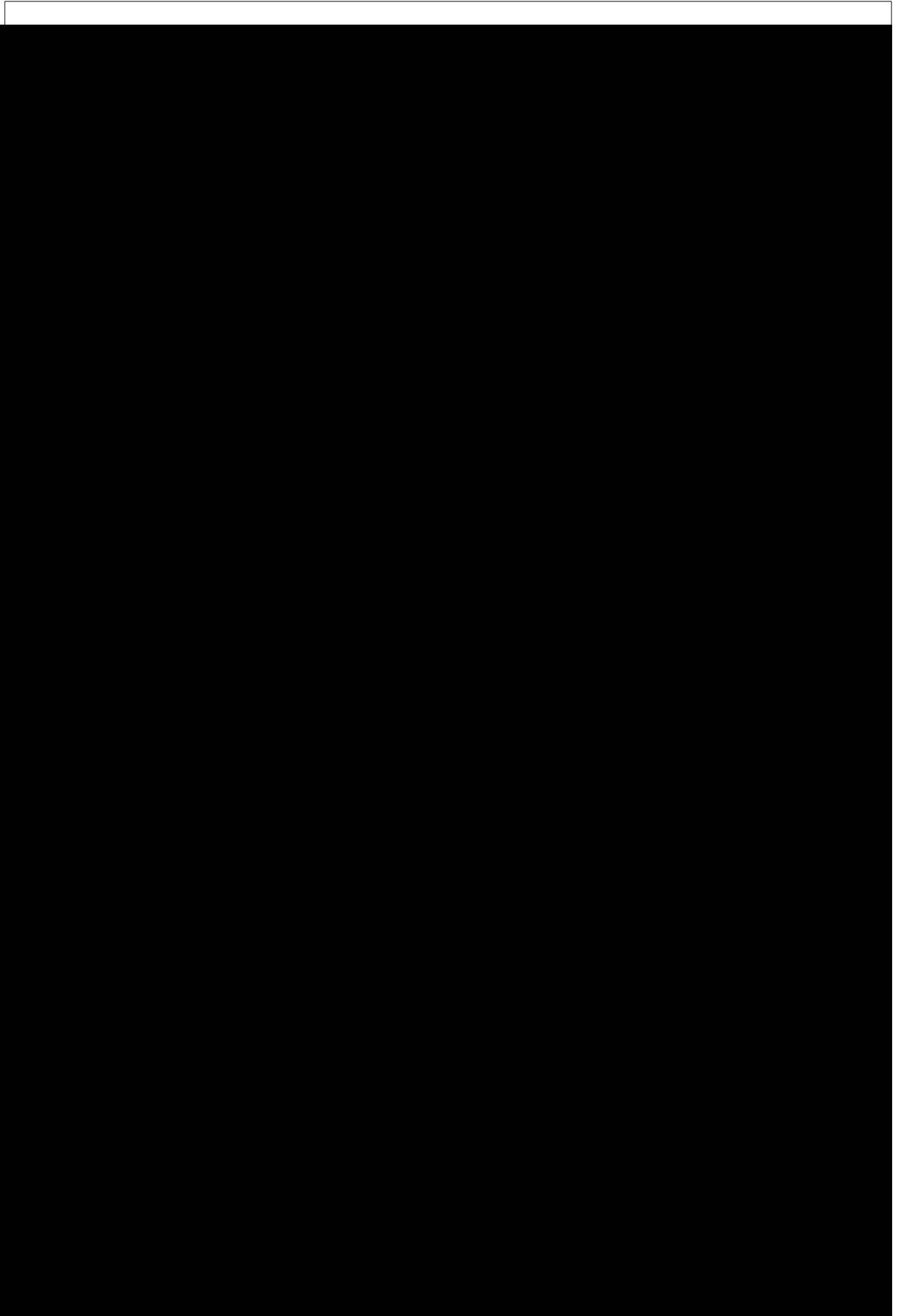
3 A. It is -- knowing that we are secondary and
4 understanding where our position is, I don't think
5 it's difficult. It's just what it is.

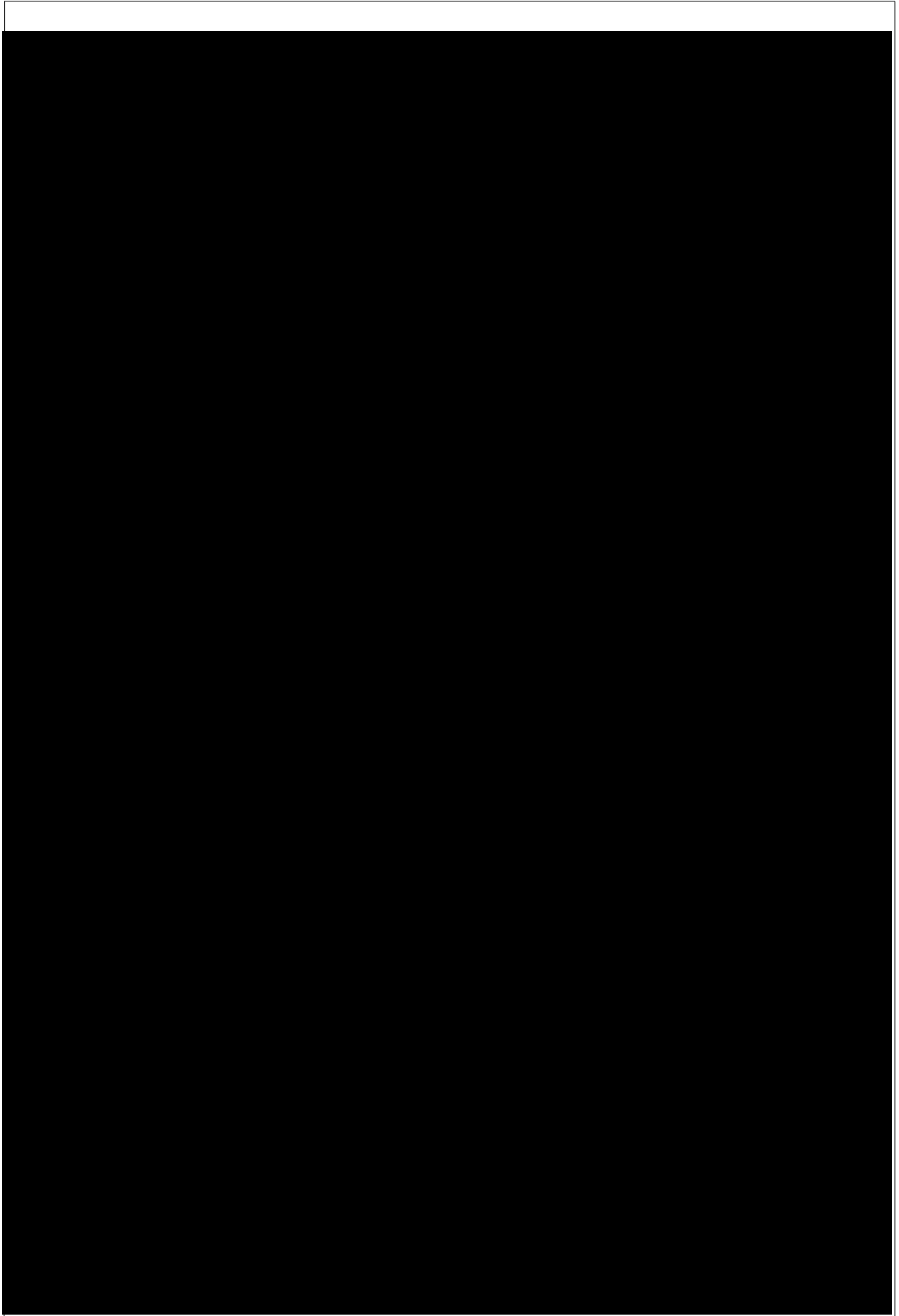
6 Q. But in your capacity as a secondary
7 distributor, there would be information that you
8 would be missing, right?

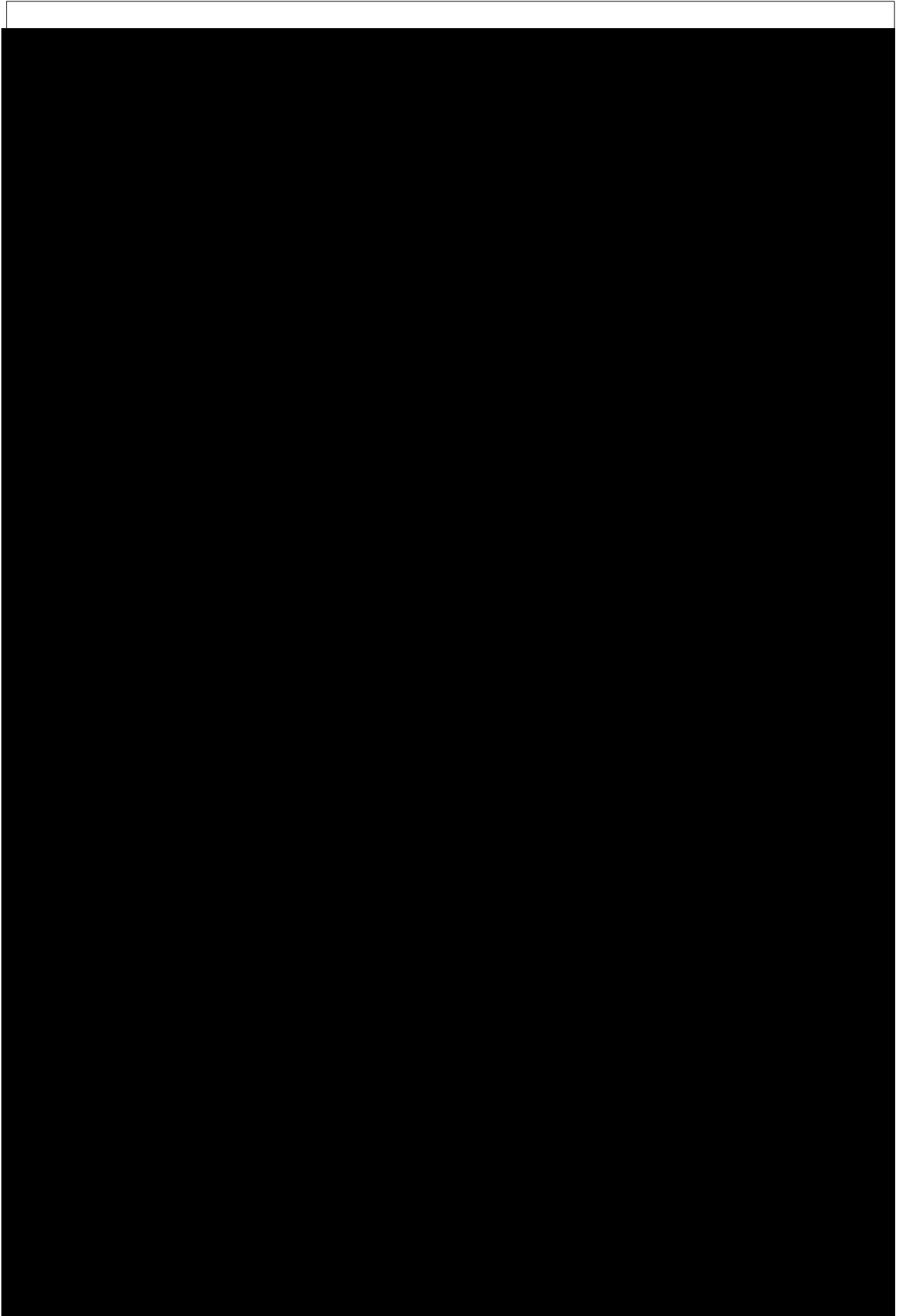
9 A. Yes, sir.

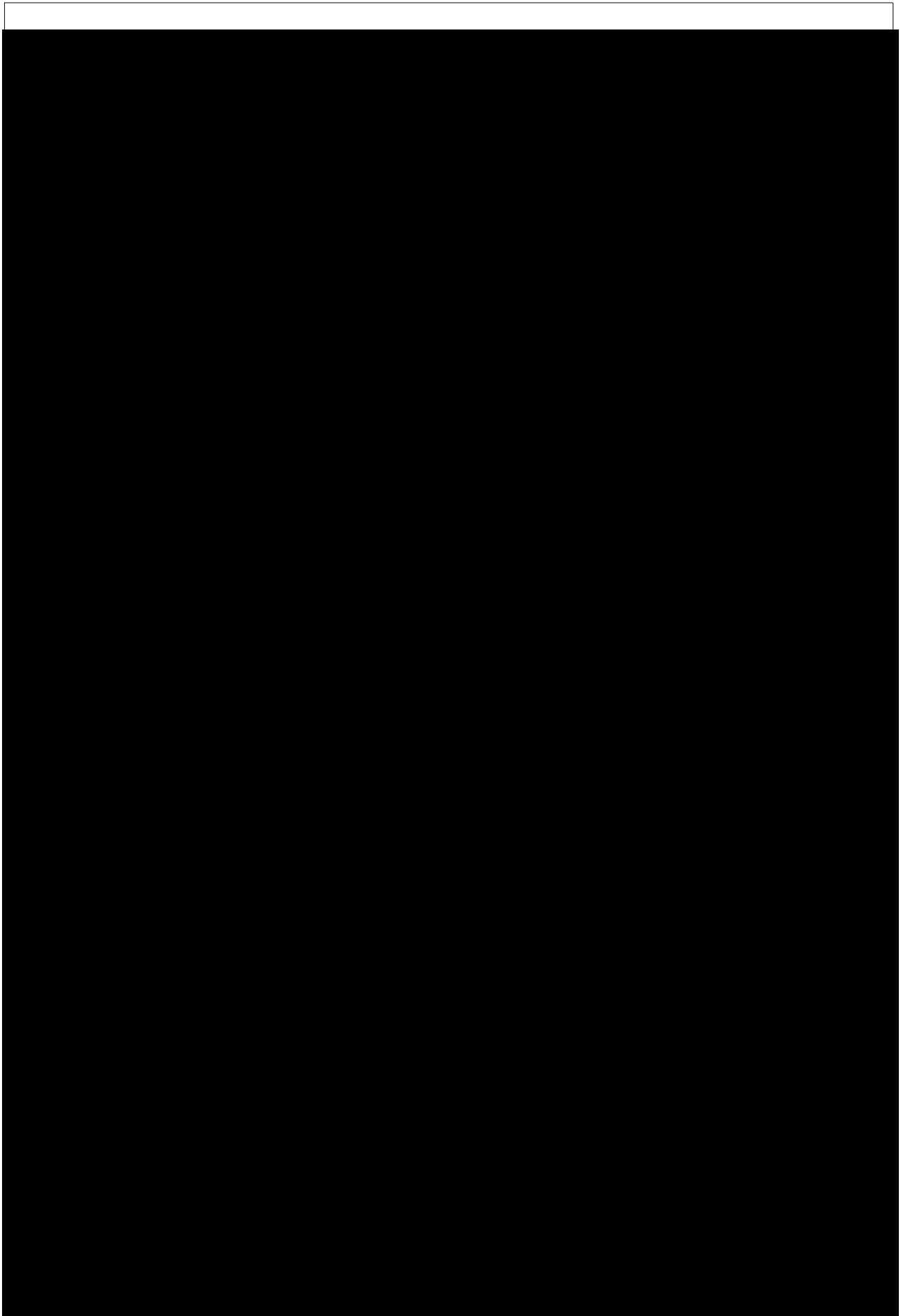


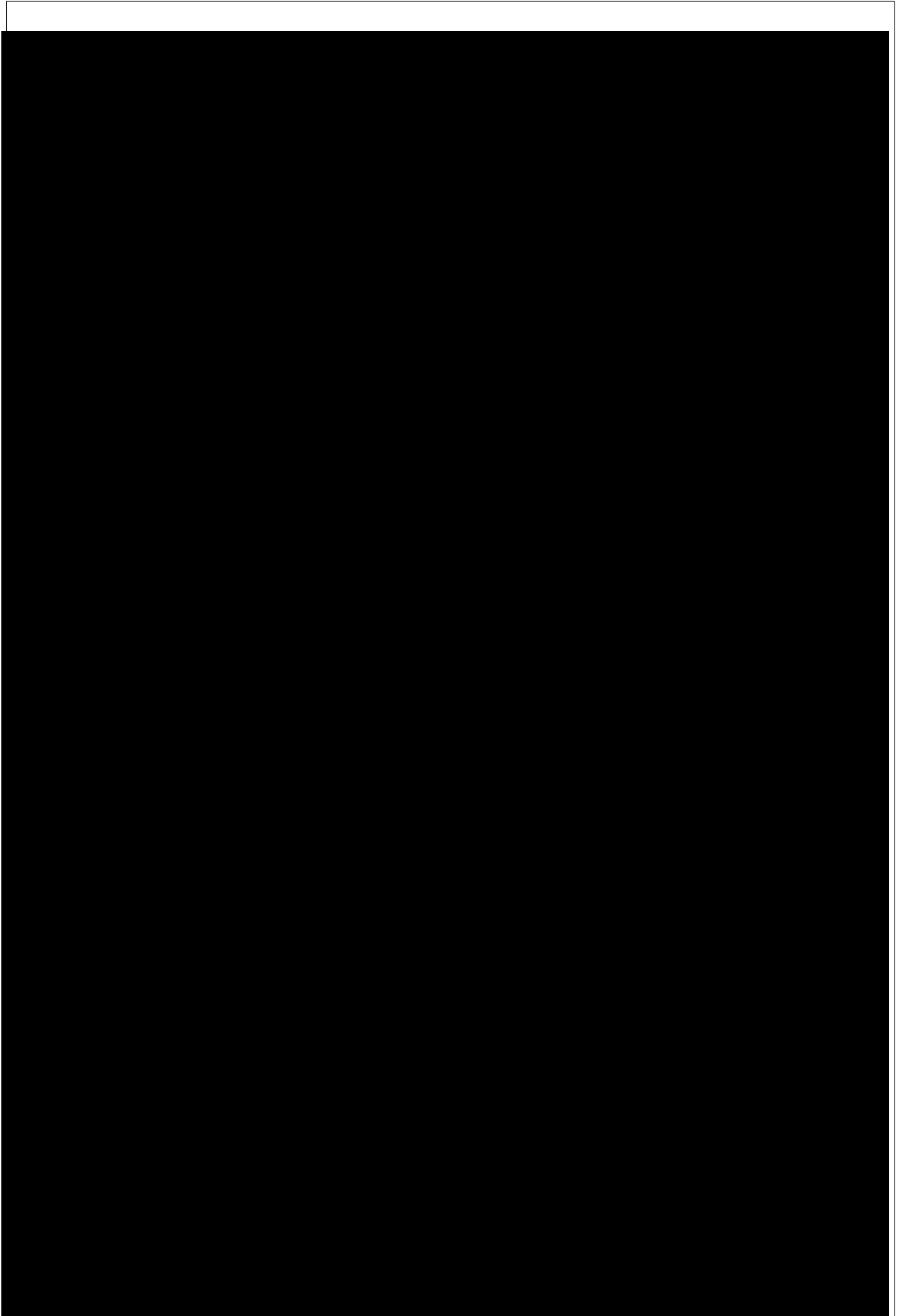


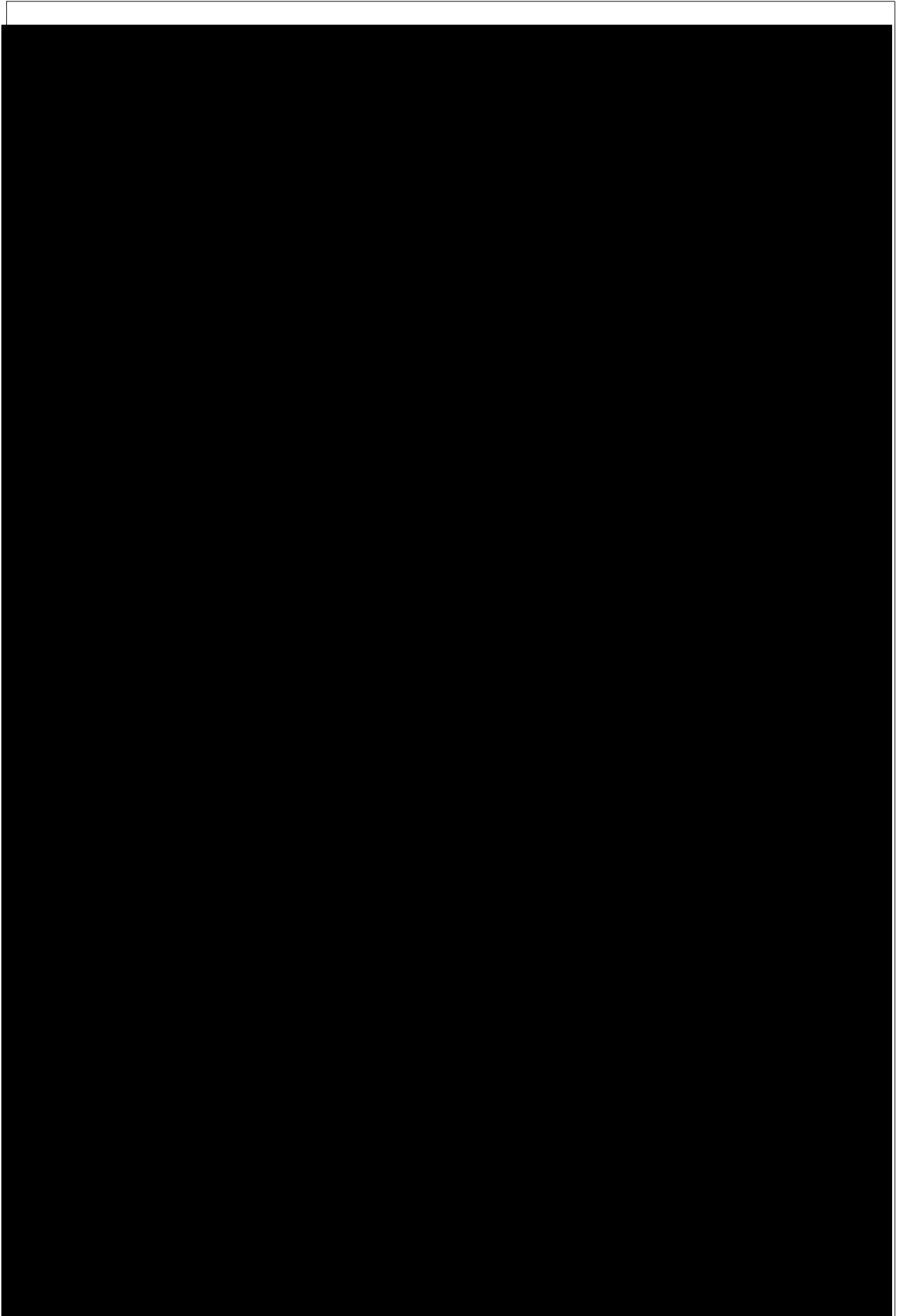


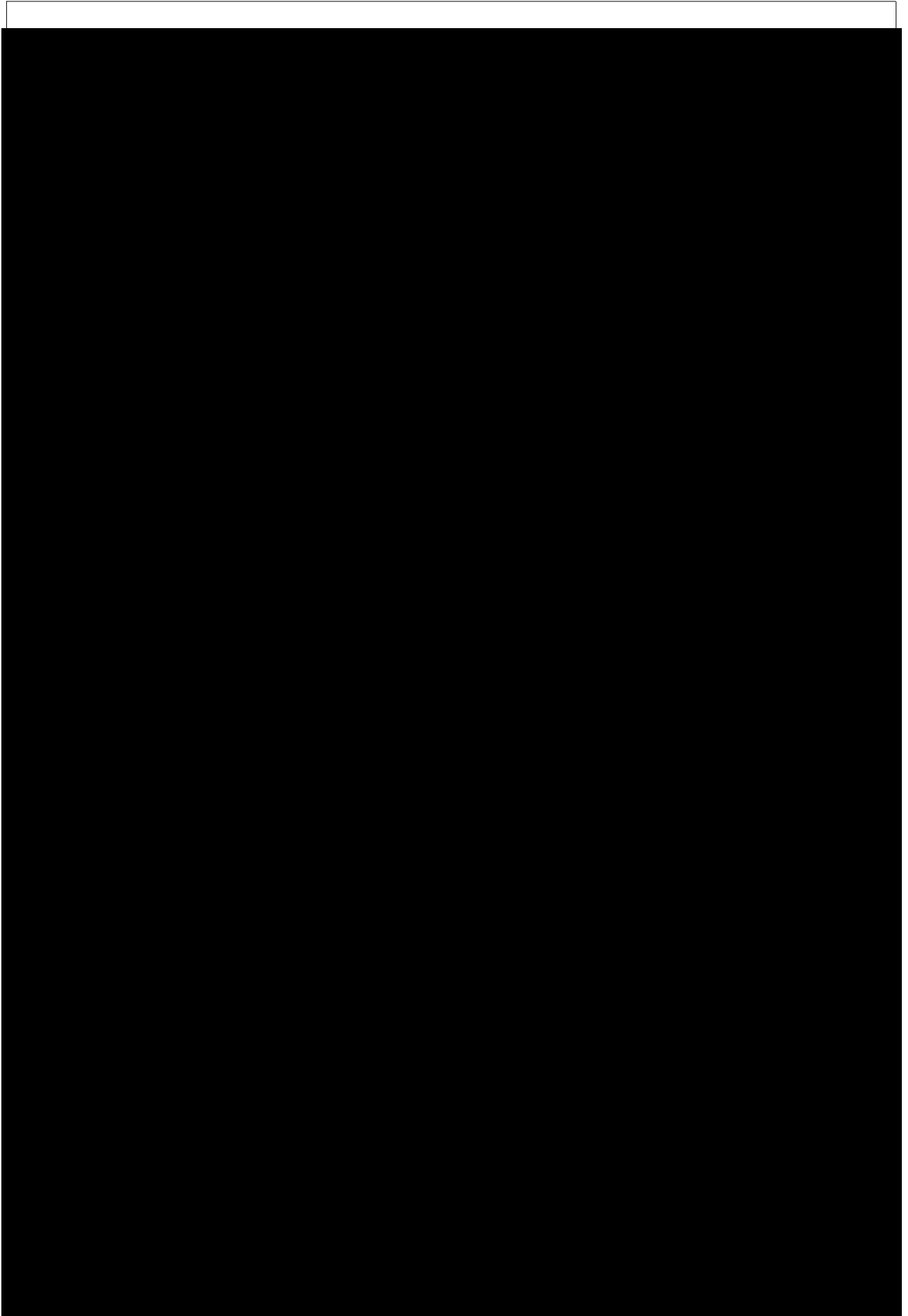












[REDACTED]

6 THE WITNESS: I can't say for certain.

7 BY MR. STOLTZ:

8 Q. I want to show you what's been marked as
9 Exhibit 14 -- not this one.

10 (Anda - Hall Exhibit 14 was marked for
11 identification.)

12 THE WITNESS: Thank you.

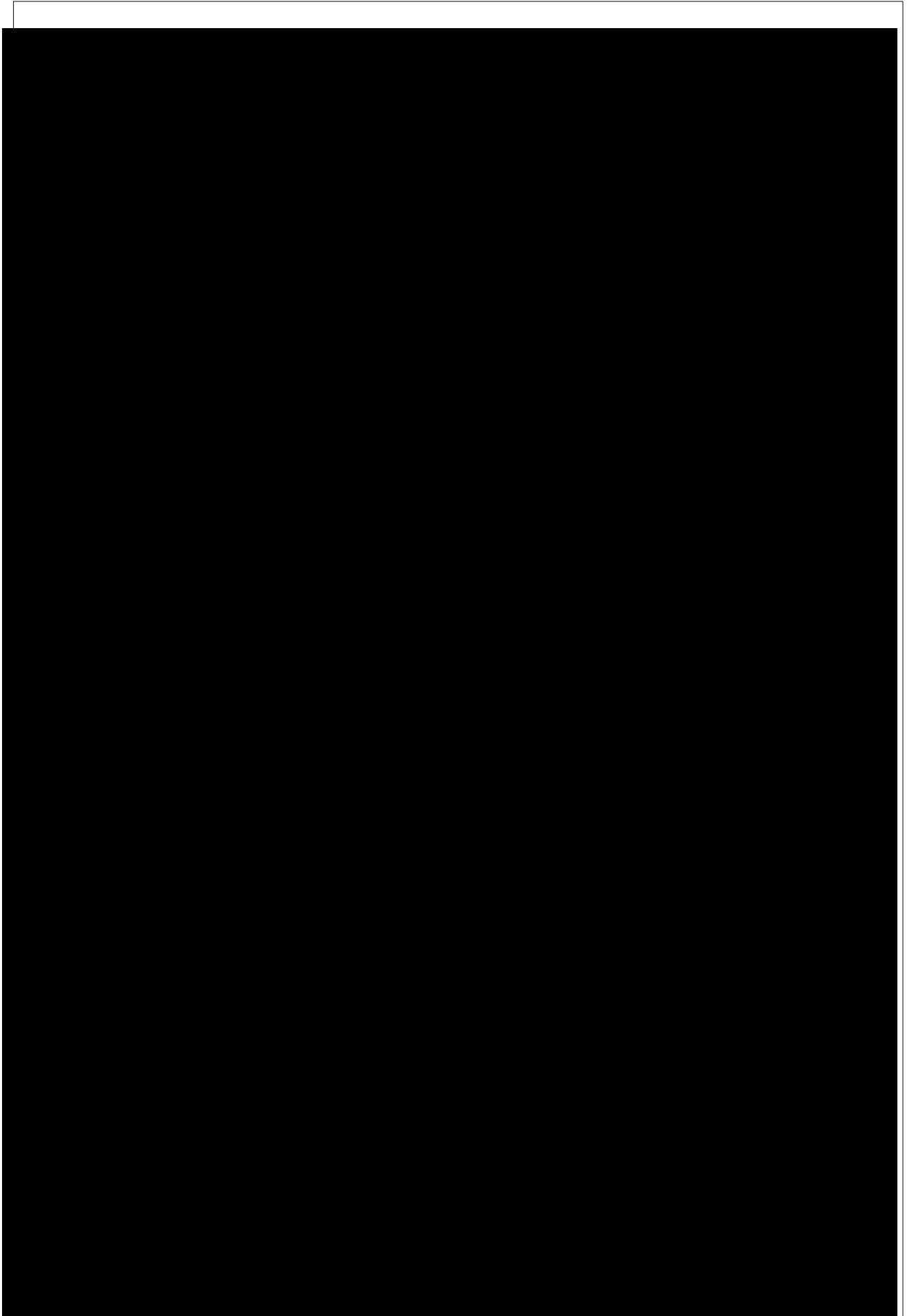
13 MR. STOLTZ: You got it?

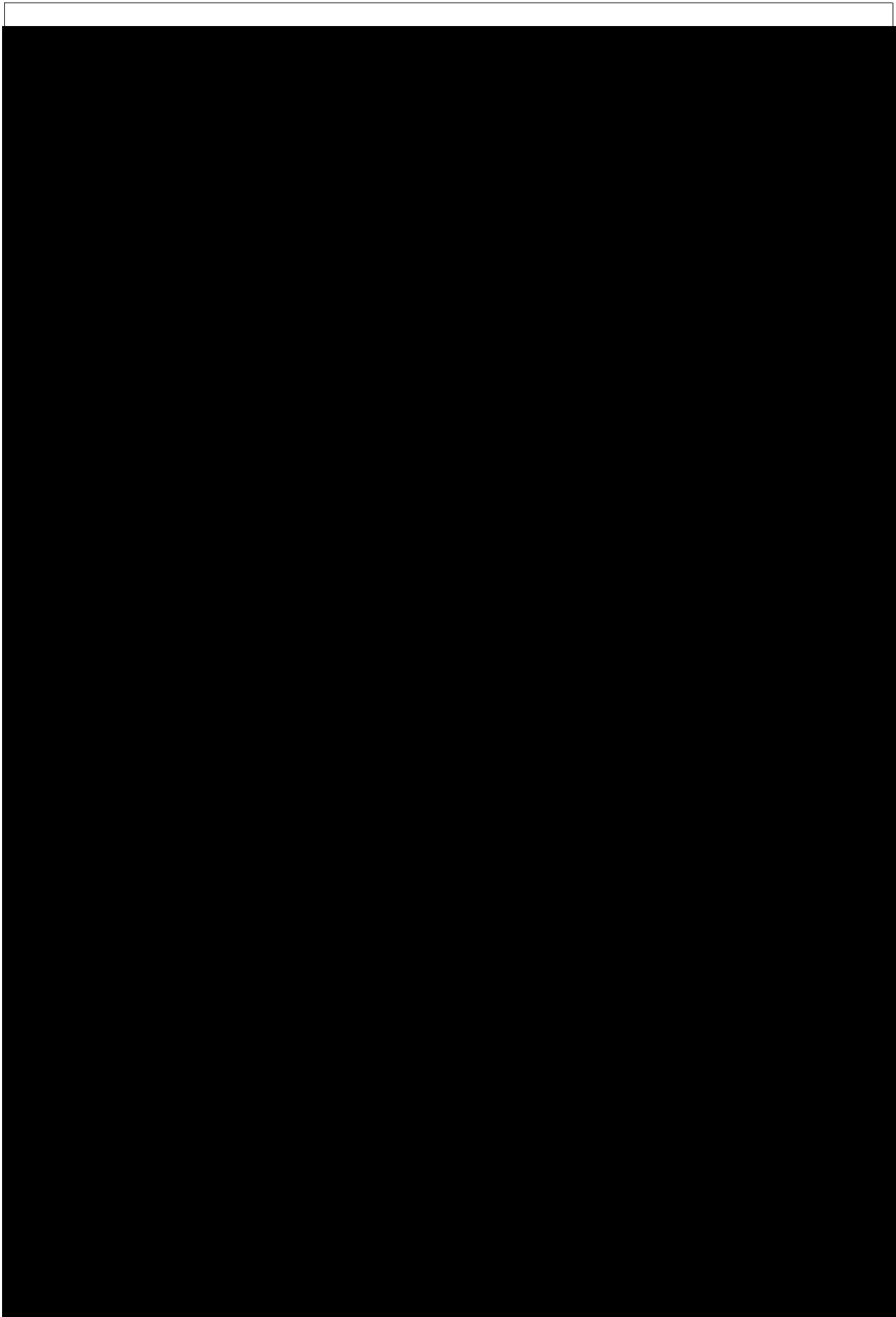
14 MS. KOSKI: Thank you.

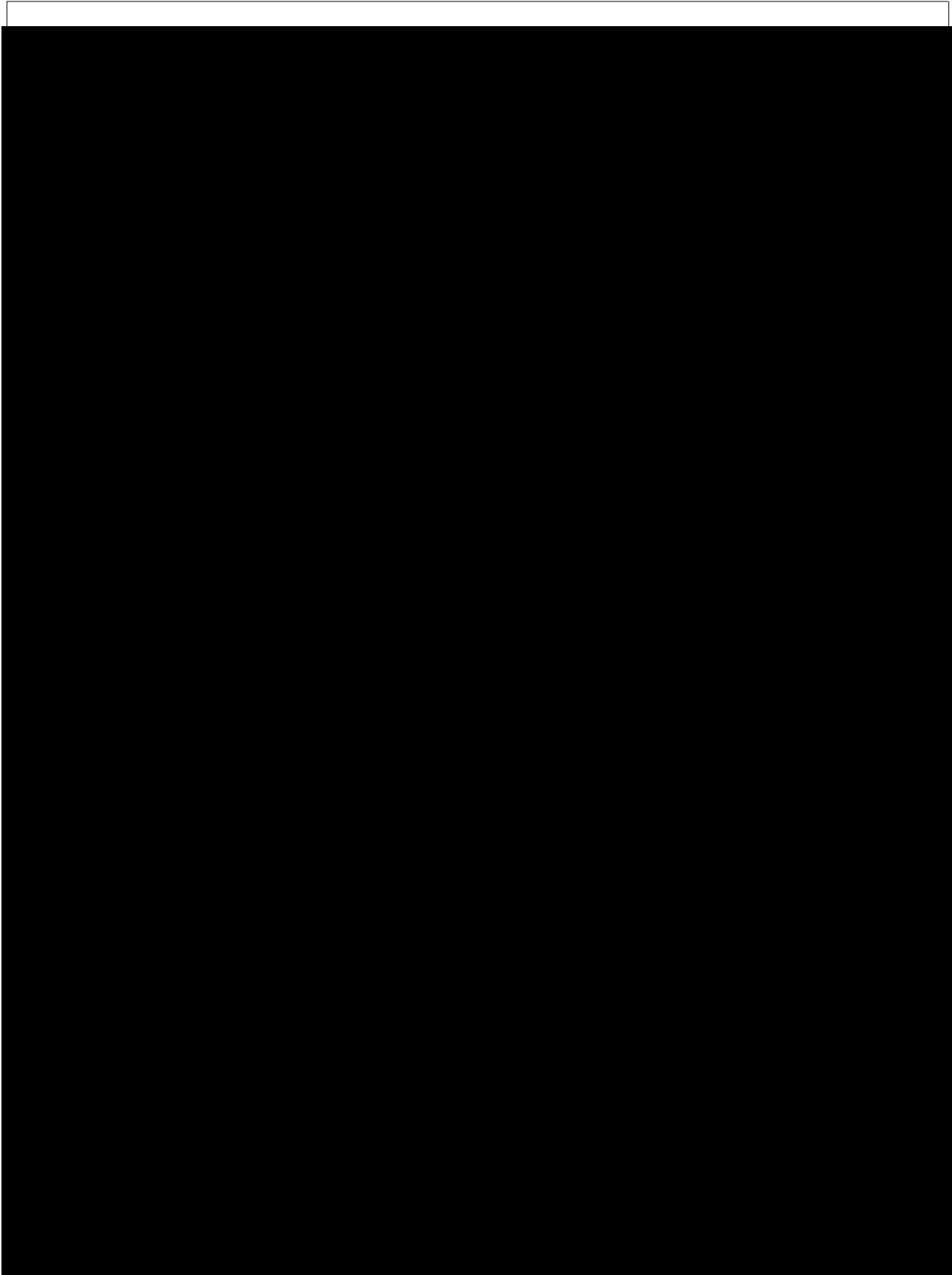
15 MR. STOLTZ: This is bearing the Bates number
16 of 132608.

17 BY MR. STOLTZ:

[REDACTED]







23 MR. STOLTZ: Just for reference, the Bates
24 number of the -- of the last exhibit is 132608.

1 MS. KOSKI: That is Exhibit 14?

2 MR. STOLTZ: Yeah.

3 Right?

4 THE WITNESS: Yes.

5 BY MR. STOLTZ:

6 Q. Who is Howard Davis?

7 A. Howard Davis was an employee at Anda in 2011,
8 I believe it was.

9 Q. Do you know when he left?

10 A. He was there for approximately 90 days or so.
11 I don't have an exact date. Maybe 2011.

12 Q. He was only at Anda for 90 days?

13 A. Yes, sir, I believe it was 90 days.

14 Q. Do you recall why he left the company?

15 A. It was a performance review at that 90-day
16 piece.

17 Q. What is data waived? Does that mean anything
18 to you?

19 A. No, sir. I'm not familiar.

20 MR. STOLTZ: Can we take a break?

21 MS. KOSKI: Sure.

22 THE VIDEOGRAPHER: Off the record at 3:42.

23 (Recess from 3:42 until 3:59 p.m.)

24 THE VIDEOGRAPHER: The time is 3:59 p.m. We

1 are now back on the record.

2 BY MR. STOLTZ:

3 Q. You mentioned earlier that the TPS or Remedy
4 wouldn't always show notes as to why an account had
5 been shut down for controlled substances, right?

6 A. You asked me if a -- if it -- if TPS notes
7 would reflect that we reported it to the DEA, I
8 believe.

9 Q. Okay. Would those reports include whether or
10 not an account was shut down?

11 MS. KOSKI: Object to form.

12 BY MR. STOLTZ:

13 Q. Shut down with respect to controlled
14 substances?

15 A. The Excel file that goes to the DEA?

16 Q. No.

17 So I'm talking about -- I guess I'm talking
18 about TPS or Remedy -- I'm not sure but -- in Anda's
19 internal systems. If there was a customer that was
20 turned off for controlled substances, the fact they
21 had been turned off for controlled substances, that
22 would be reflected on TPS?

23 A. Yes, sir.

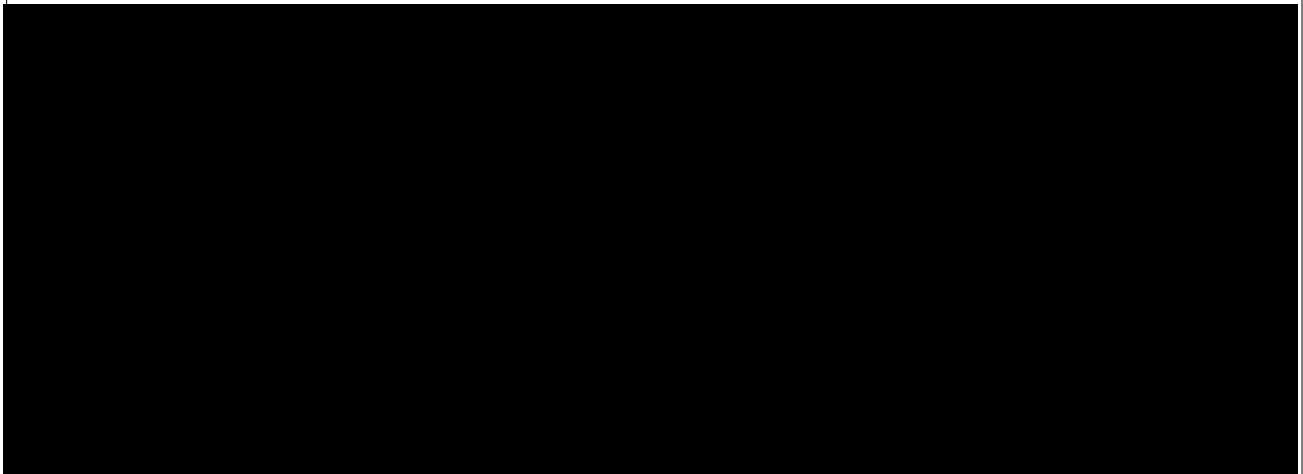
24 Q. Would -- would the reason why they had been

1 turned off be reflected on TPS?

2 A. It might not necessarily go into detail.

3 Q. So it would just be like a little blur over
4 something sometimes?

5 A. Yes, sir.



12 BY MR. STOLTZ:

13 Q. Okay. So when you were working on suspicious
14 order monitoring prior to Robert Brown coming on
15 board, that included -- that included order of
16 interest review process.

17 Did it also include control limit increase
18 process?

19 A. Yes, sir.

20 Q. And it also included whether or not to turn
21 on a customer for controls in the first place?

22 A. Yes, sir.

23 Q. And when somebody was initially turned on for
24 control, it would be turned on for 1,000 units?

1 A. Typically.

2 Q. What is a unit? I mean, what does that refer
3 to? Is that like a pill bottle or --

4 A. So 1,000, in that family, they would be able
5 to receive 1,000 tabs, let's say. So a tab -- if a
6 bottle is 100 -- or 500 in a bottle, they will be
7 able to receive two bottles.

8 Q. Okay. Was that ever -- was that always
9 just -- so you're kind of on both ends of the -- you
10 know, on one hand, you are doing this in 2012, and
11 then you take over for Robert Brown on a temporary
12 basis in 2017?

13 A. Yes, sir.

14 Q. Do you recall when he was fired?

15 MS. KOSKI: Object to form.

16 BY MR. STOLTZ:

17 Q. When was Robert Brown fired?

18 MS. KOSKI: Object to form.

19 THE WITNESS: He was laid off in -- around
20 January-ish -- January/February 2017.

21 BY MR. STOLTZ:

22 Q. Okay. When you were running controlled
23 substance compliance in 2012, "units" referred to
24 tabs.

1 Did they refer to tabs in 2017?

2 A. Yes, sir.

3 Q. Was there ever any consideration given to the
4 actual strength of the tabs? So, for example, would
5 oxycodone 30-milligram be in the same family as
6 oxycodone 15-milligram?

7 A. The same family, the chemical family, yes,
8 sir.

9 Q. Okay. So I could -- I could -- if I was a
10 customer and I had a limit of 1,000 tabs, I could
11 buy, for example, 1,000 oxycodone 30 milligrams or I
12 could order 1,000 oxycodone 15-milligram, but both of
13 those would -- either would reach my limit, right,
14 even though one is twice as much of the chemical as
15 the 15-milligram?

16 MS. KOSKI: Object to form.

17 THE WITNESS: The chemical family, yes.

18 BY MR. STOLTZ:

19 Q. So 1,000 tabs is not very much.

20 MS. KOSKI: Object to form.

21 BY MR. STOLTZ:

22 Q. Would customers ever be given more than
23 1,000 -- what was the purpose for such -- such a
24 low -- a low threshold to start? I mean, was there

1 ever a process where someone could have a threshold
2 that was much higher -- much higher on the front end?

3 MS. KOSKI: Object to form.

4 THE WITNESS: We typically started with
5 1,000, especially with new customers, until we
6 could get a feel for what their business is and
7 how they were going to utilize Anda.

8 BY MR. STOLTZ:

9 Q. Okay. Were -- did you ever treat thresholds
10 differently with -- if you were a primary distributor
11 as opposed to a secondary distributor?

12 MS. KOSKI: Object to form.

13 THE WITNESS: If we were a primary, our -- it
14 would all depend on the due diligence, the
15 dispensing data, where that -- what that customer
16 was doing, and the bigger picture.

17 BY MR. STOLTZ:

18 Q. Okay. But there were times when Anda was a
19 primary across the board -- was -- was Anda ever the
20 primary distributor across all chemical families?

21 A. I can't say for sure that we were.

22 Q. But were there times when Anda was the
23 primary with respect to a certain chemical family?

24 A. Yes, I believe so.

1 Q. Okay.

2 (Anda - Hall Exhibit 15 was marked for
3 identification.)

4 BY MR. STOLTZ:

5 Q. I'm going to show you what's been marked as
6 Exhibit 15, bearing the Bates of
7 Anda_Hall_Personnel_001.

8 A. Yes, sir.

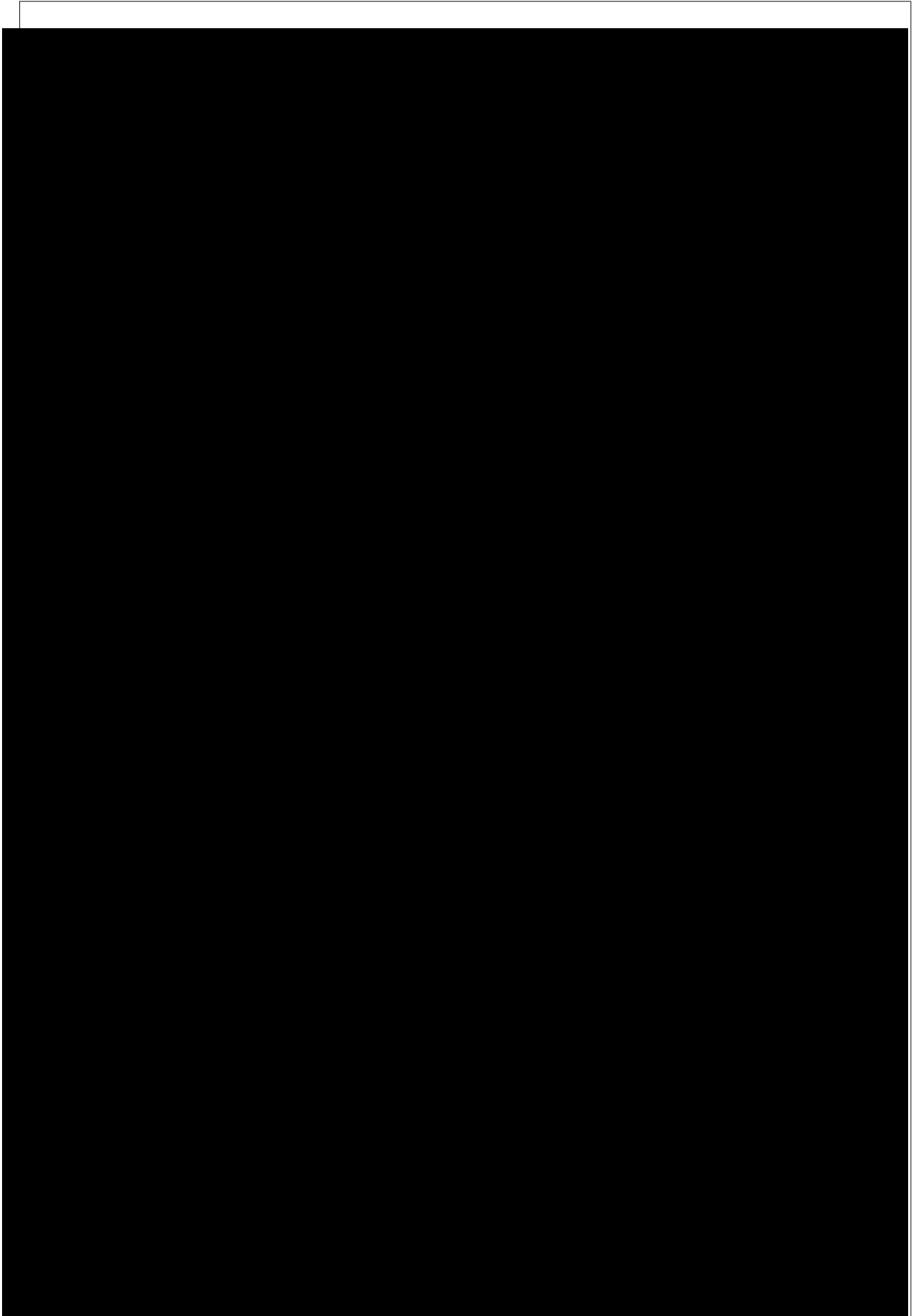
9 MS. KOSKI: Thanks.

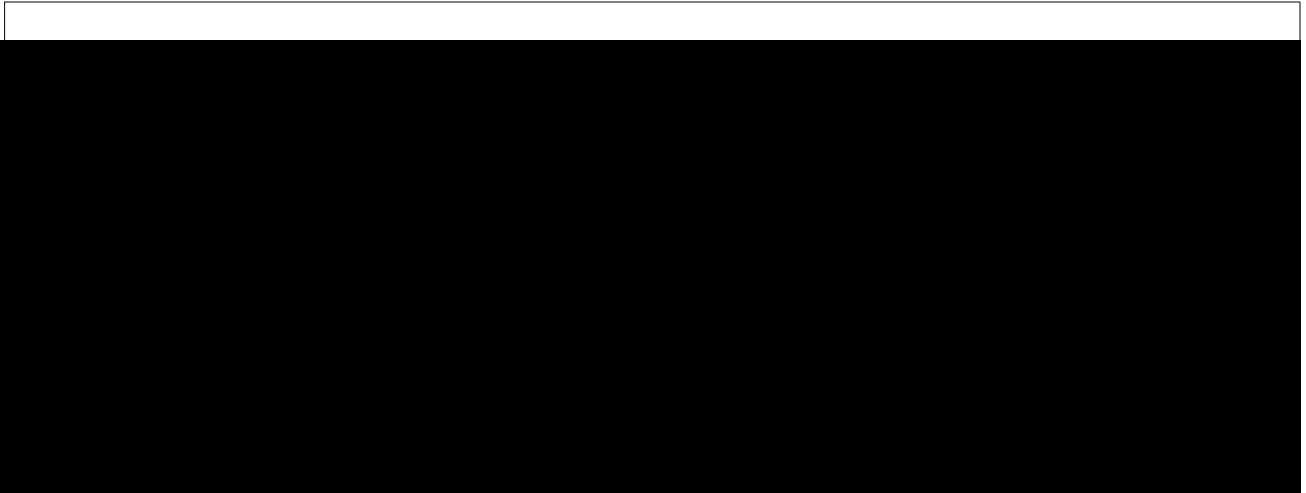
10 MR. STOLTZ: I'm sorry I don't have an
11 additional copy. I'm happy to put it on the
12 ELMO.

13 MS. KOSKI: And for the record, we have
14 produced this with a temporary Bates so that we
15 could get it to you quickly, but it will be
16 produced in the normal course as part of a bigger
17 production, just for people reading the
18 transcript.

19 BY MR. STOLTZ:







7 Q. Okay. Do you remember why the Groveport,
8 Ohio facility was closed?

9 A. We transitioned that facility to Olive
10 Branch, Mississippi because they were closer to the
11 FedEx hub.

12 Q. And when it came to regulatory compliance,
13 did the regulatory compliance department ever have an
14 employee located at the warehouses, whether that was
15 in Groveport or Mississippi?

16 A. No, we did not have somebody from compliance
17 at either of those facilities.

18 Q. What was -- what was the virtual warehouse
19 system? Did you have any familiarity with the
20 virtual warehouse at Anda?

21 A. No, sir.

22 Q. And who was your supervisor? Was that
23 Jay Spellman?

24 MS. KOSKI: Object to form.

1 THE WITNESS: At which time?

2 BY MR. STOLTZ:

3 Q. 2016.

4 A. Yes, sir.

5 Q. And what was his title?

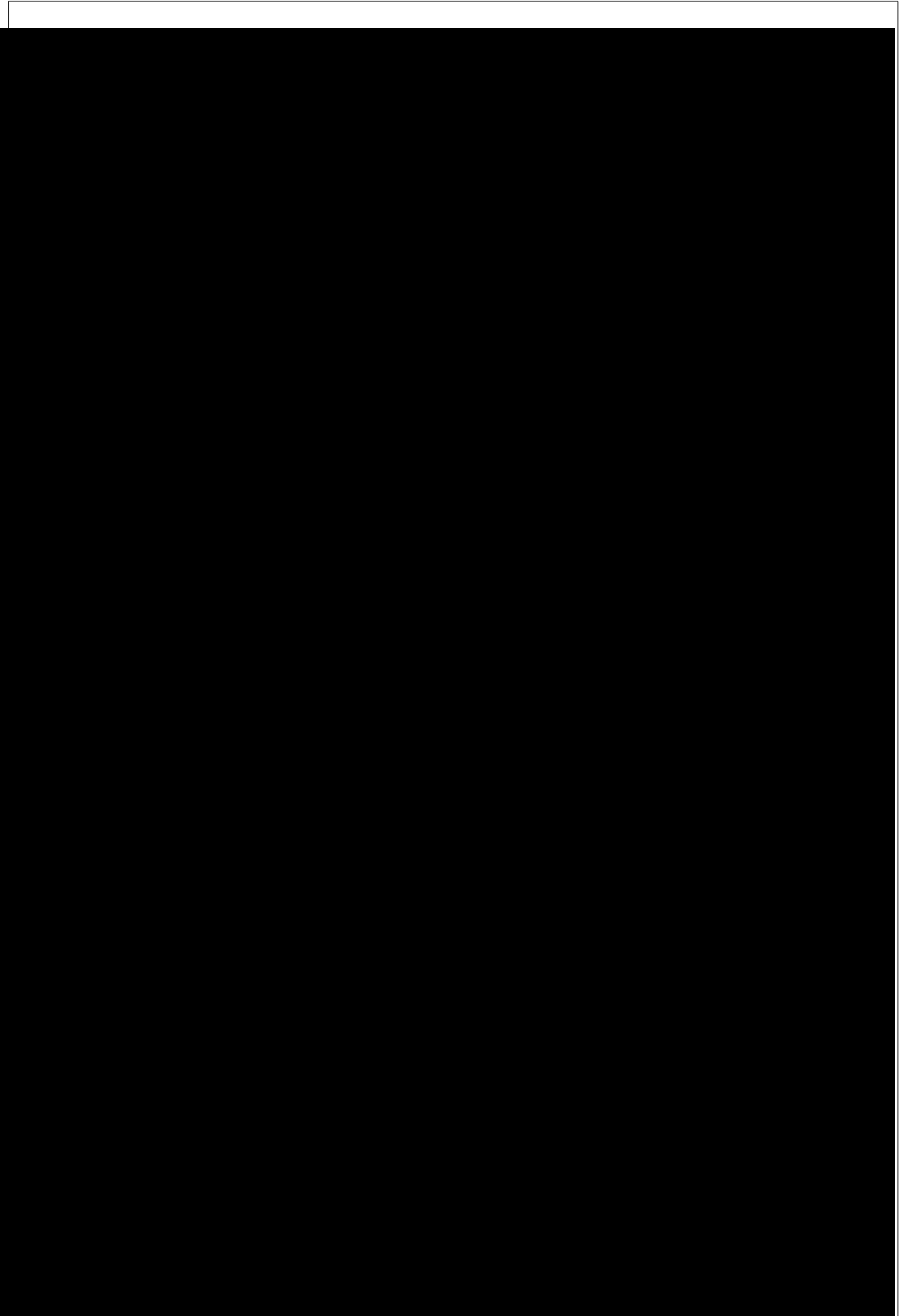
6 A. I believe his title is executive director on
7 distribution and compliance.

8 Q. Did he eventually -- who eventually took on
9 Robert Brown's role?

10 A. Sabrina Solis.

11 Q. Okay. Was there ever a time that
12 Jay Spellman took on that role?

13 A. Not directly, but he oversaw the whole
14 department.



17 And instruct you not to answer to the extent
18 it calls for a legal conclusion, I think, at the
19 end, although I didn't understand the question.

20 You may want to restate the question.

21 I would instruct her not to -- if you didn't
22 intend to do that, then I would object as to
23 form.

24 ///

1 BY MR. STOLTZ:



2 (Anda - Hall Exhibit 16 was marked for
3 identification.)

4 BY MR. STOLTZ:

5 Q. I want to show you what's been marked as
6 Exhibit 16 --

7 A. Thank you.

8 Q. -- bearing the Bates number 136372. And this
9 was back when Howard Davis was still with Anda.

10 MS. KOSKI: Could we get a copy?

11 MR. STOLTZ: Yeah. Sorry about that.

12 BY MR. STOLTZ:

13 Q. Now, at this time in December of 2011, was
14 Howard Davis in charge of controlled substance
15 compliance?

16 MS. KOSKI: Object to form.

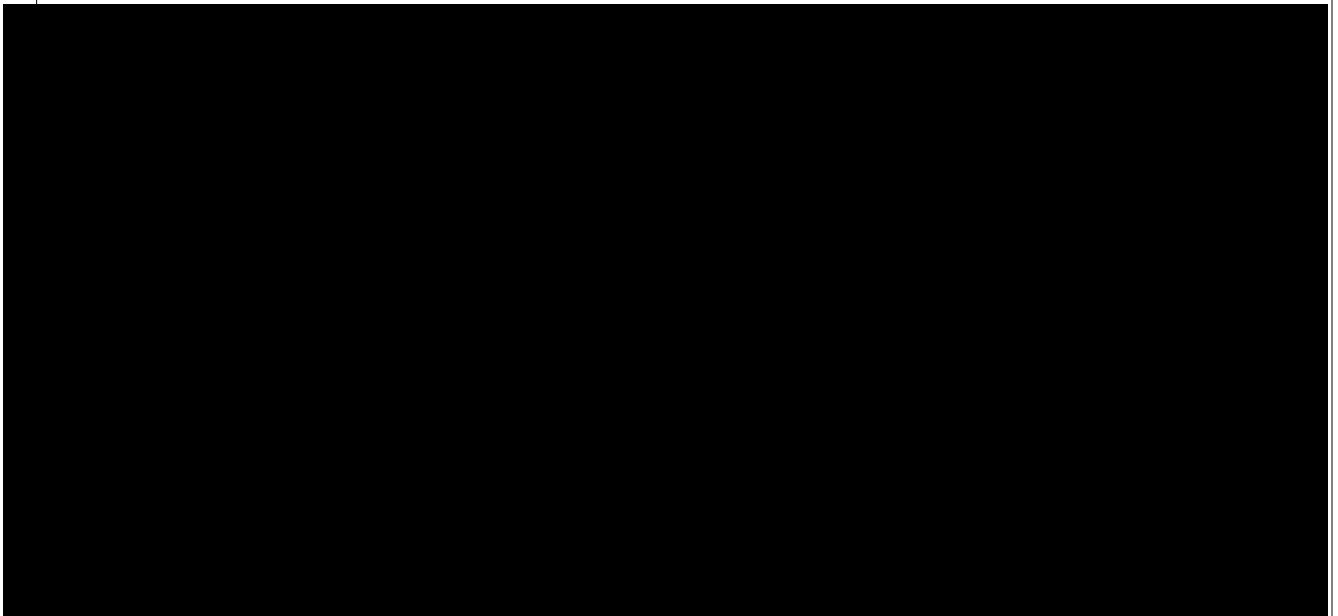
17 BY MR. STOLTZ:

18 Q. What was Howard Davis's role?

19 A. He was hired to oversee DEA analysts.

20 Q. Okay. So he had the position that
21 Robert Brown ended up getting hired for?

22 A. Yes, sir.



9 Q. Oh, okay. I see.

10 And Pat Williams, she was in sales, right?

11 A. Pat Williams oversaw the sales department.

12 I'm not sure what her title was.

13 Q. And sales, they would typically have access
14 to TPS? Did they have access to Remedy as well, or
15 they would only be able to make opportunity -- like,
16 create opportunities that would be kicked up to
17 someone else through Remedy?

18 MS. KOSKI: Object to form.

19 THE WITNESS: So they would be able to go
20 into Remedy and create an opportunity, a task.

21 BY MR. STOLTZ:

22 Q. But they wouldn't necessarily be able to --
23 to access Remedy?

24 A. (Nodding head.)

1 Q. They would be able to?

2 A. Yes, sir.



[REDACTED]

2 Was sales usually notified contemporaneously?

3 A. Through opportunities. So if a rep submits
4 an opportunity for an increase or a new customer, the
5 task goes back to them once we close it.

6 Q. And at this time in 2011, December of 2011,
7 you were working with controlled substance
8 compliance; is that accurate?

9 A. That was part of my responsibility, yes.

10 Q. And was it your understanding at that time
11 that it was -- it was your responsibility to report
12 suspicious customers to the DEA?

13 A. Yes, sir.

[REDACTED]

21 Q. Do you know if this drugstore was ever
22 referred to the DEA as a suspicious customer?

23 A. No, I don't know, sir.

24 Q. Do you know if it was the policy of Anda to

1 report suspicious customers contemporaneously with
2 turning off a customer from controlled substances?

3 A. Yes, that was the policy at Anda.

4 Q. Was that the policy in December of 2011?

5 A. Yes, sir.

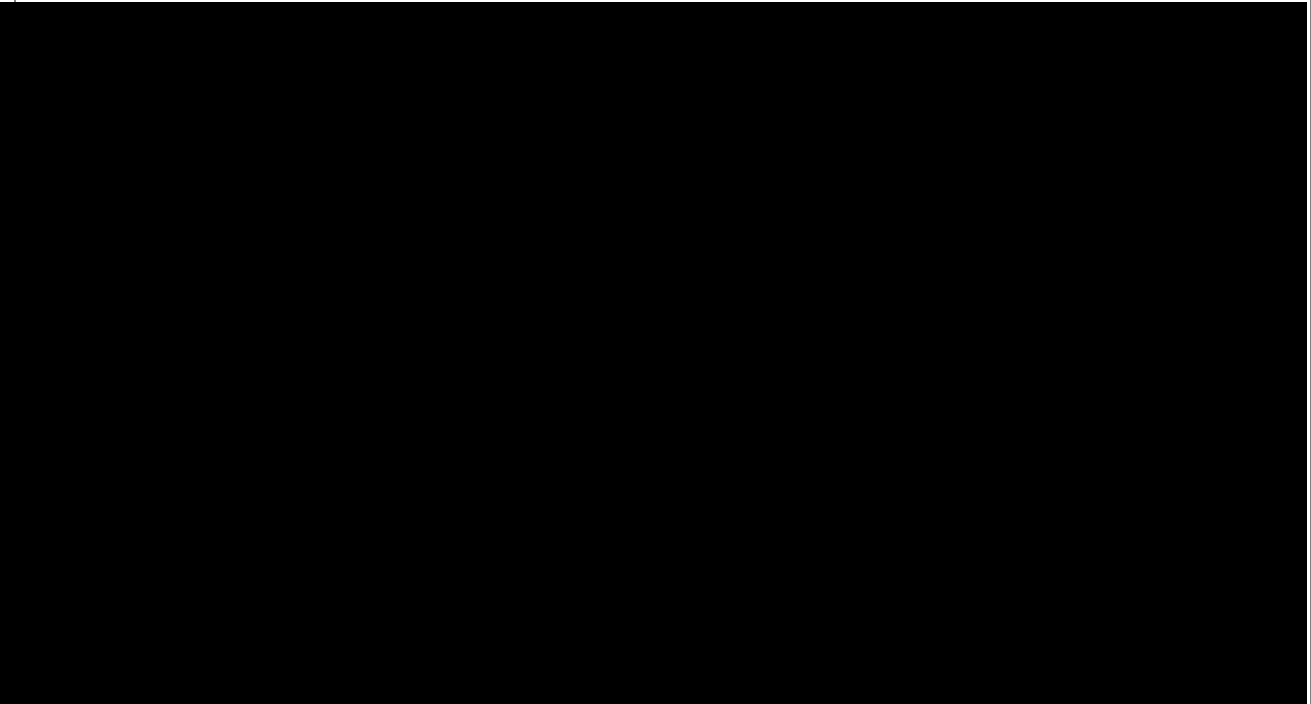
6 (Anda - Hall Exhibit 17 was marked for
7 identification.)

8 MR. STOLTZ: I'm going to show you what's
9 been marked as Exhibit 17, bearing the Bates
10 number of 133103.

11 THE WITNESS: Thank you.

12 MS. KOSKI: Thank you.

13 BY MR. STOLTZ:

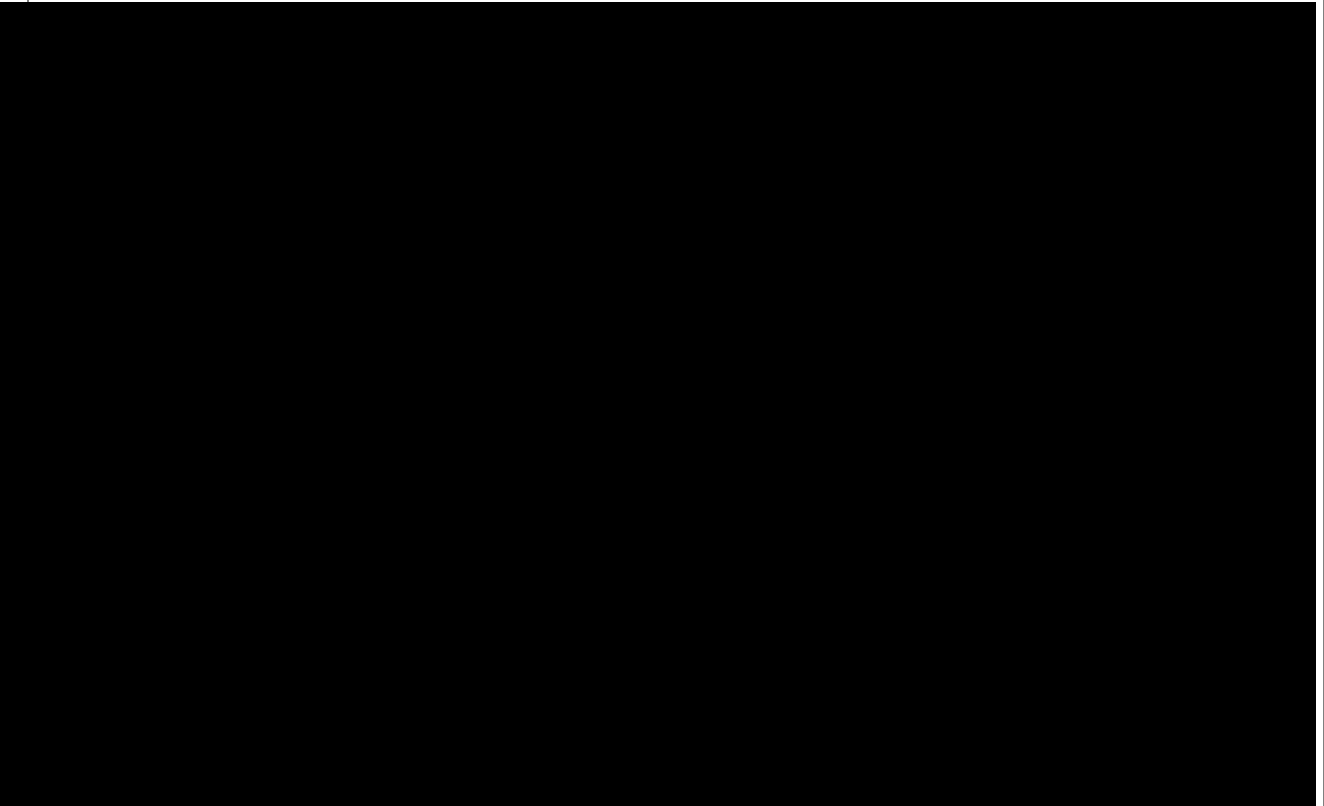


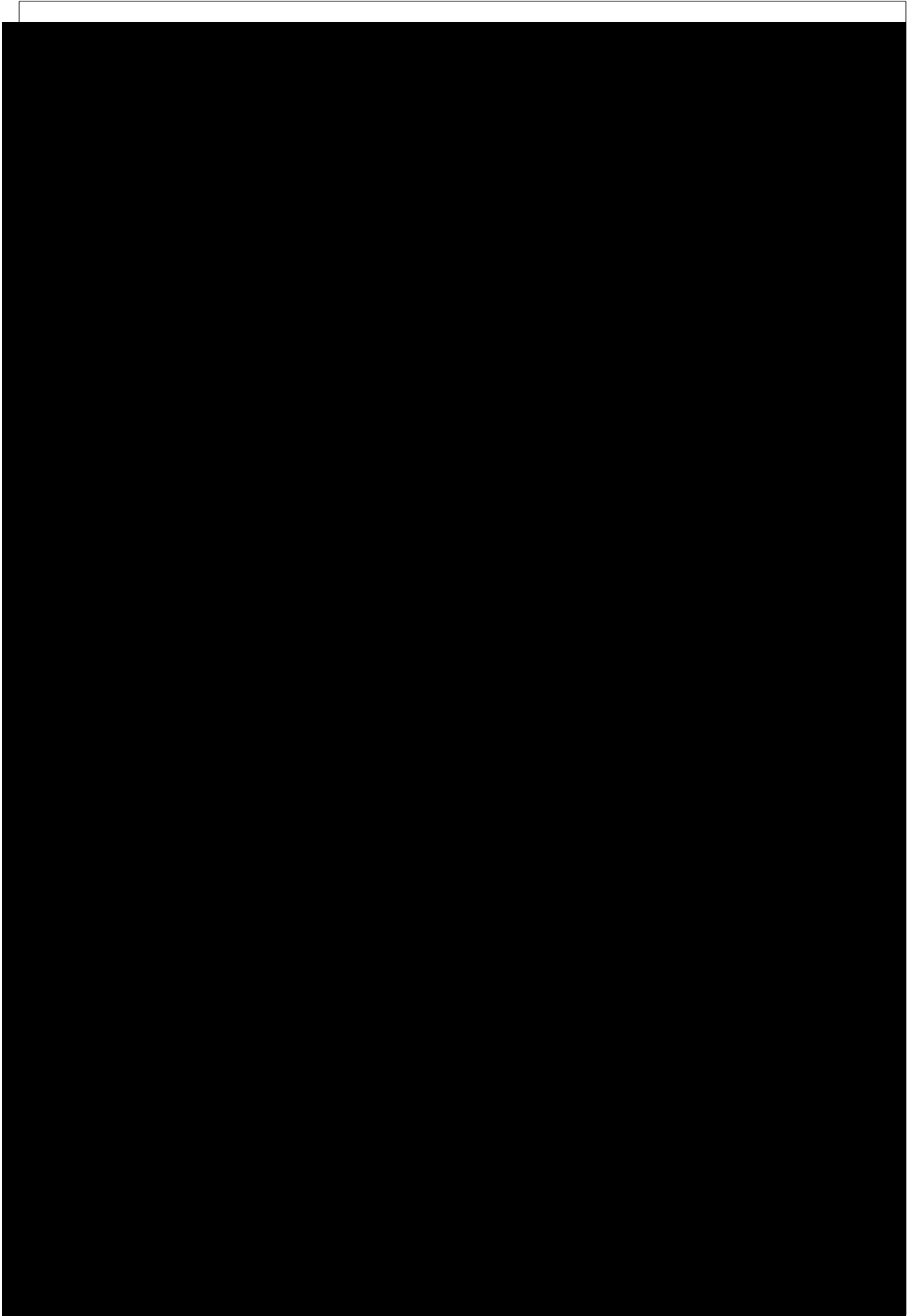
10 A. Valerie Nemia, yes.

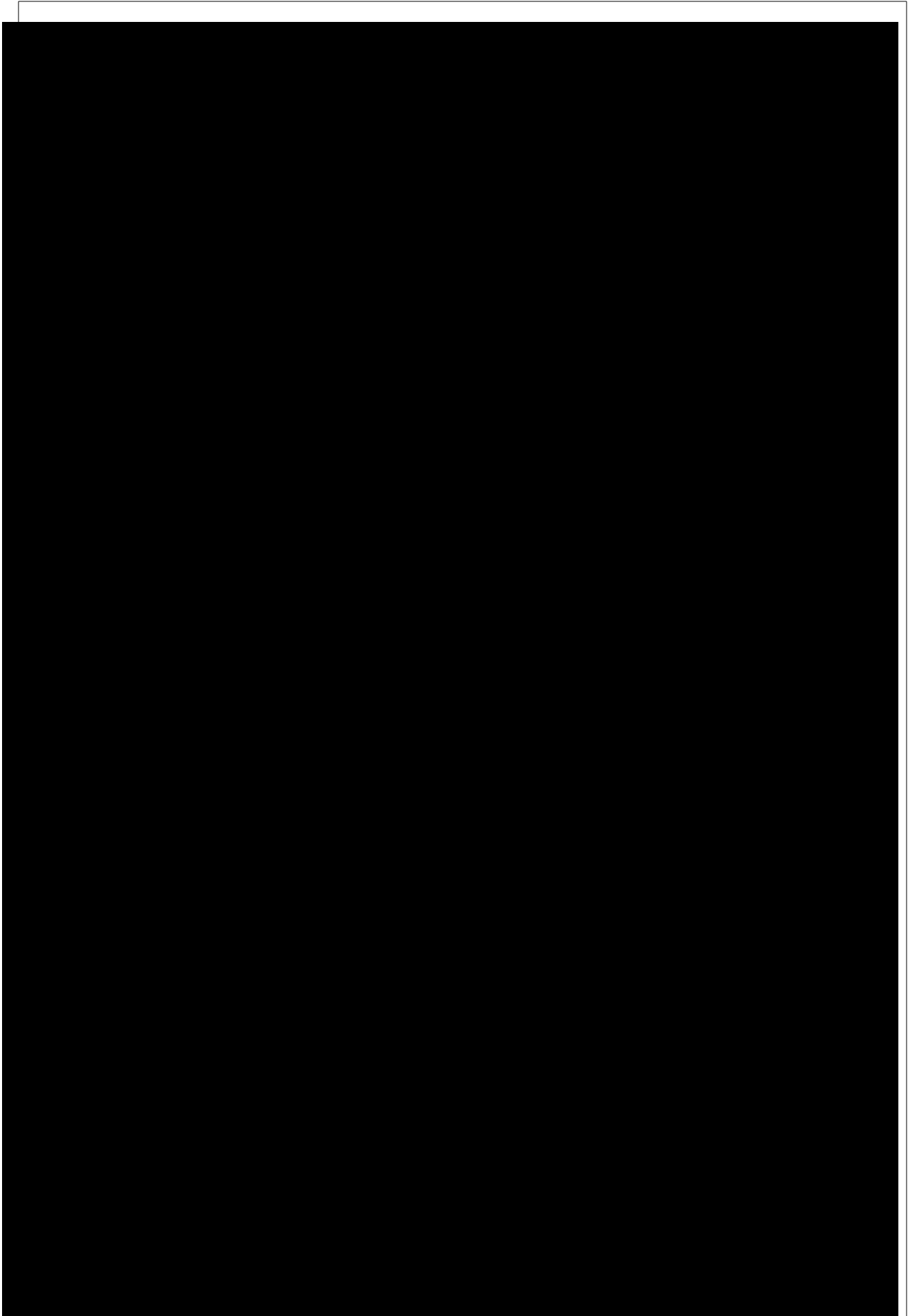
11 Q. What was her position?

12 A. Sales. I don't know her exact title.

13 Q. Yeah, she was the sales manager. There was
14 different -- there was different reps. Okay.







[REDACTED]

3 Q. Please let me know if there's something else
4 happening and any updates you can.

5 MS. KOSKI: Is that a question for the
6 witness?

7 MR. STOLTZ: No. I'm sorry.

8 BY MR. STOLTZ:

[REDACTED]

4 BY MR. STOLTZ:

5 Q. Was it your feeling that Anda was being
6 watched in 2011 -- December of 2011?

7 A. No, sir.

11 THE WITNESS: I think it's time for all of us
12 to take a cruise.

13 MS. KOSKI: That's a kind of torture that you
14 have to look out the window at the cruise ships
15 coming in and out.

16 THE WITNESS: They're going on vacation.

17 MR. STOLTZ: What's that?

18 THE WITNESS: The cruise ships.

19 MR. STOLTZ: I promise you, we're almost
20 finished.

21 THE WITNESS: Great. Thank you.

22 BY MR. STOLTZ:

23 Q. Were you aware of the large fines that the
24 DEA imposed on Cardinal and McKesson and other

1 distributors?

2 MS. CARDENAS: Object to form.

3 MS. VAN TASSELL: Object to form. This is

4 Rebecca Van Tasell.

5 MS. KOSKI: You can answer.

6 THE WITNESS: Just general from the news.

7 MR. STOLTZ: Just a couple more documents and

8 we'll get out of here.

9 BY MR. STOLTZ:

10 Q. Who is Mezanne Moo Young?

11 A. Mezanne Moo Young works in our procurement

12 department for nontrade items.

13 MR. STOLTZ: Just two more documents.

14 I'll show you what I'll mark as Exhibit 18.

15 It's bearing the Bates numbers 313264.

16 (Anda - Hall Exhibit 18 was marked for

17 identification.)

18 MS. KOSKI: Thank you.

19 BY MR. STOLTZ:

7 Q. And who was John Kincaide?

8 A. John Kincaide was a DEA analyst.

9 Q. So Rachelle Vance, she was a sales rep, or
10 what was her role at Anda?

11 A. Rachelle Vance is a national accounts.

12 Q. National accounts?

13 A. Sales. I don't remember if she's a manager
14 or director, but she worked in the national account
15 department.

23 Q. So each customer gets treated a little bit
24 differently?

1 MS. KOSKI: Object to form.

2 By MR. STOLTZ:

3 Q. Why would you treat customers differently?

4 A. Depending on how often they order from us,
5 how many times their orders hitting in our order of
6 interest bucket. Variables.

7 Q. Why would -- why would how often they order
8 from Anda be relevant to whether or not an increase
9 in controls is granted?

10 A. I'm not clear on your question.

11 Q. You said that one of the ways -- the reasons
12 customers were treated differently could depend on
13 how often they order from Anda.

14 My question is: Why would the frequency of
15 their orders from Anda be relevant when deciding
16 whether or not to increase a control limit?

17 A. So somebody that hasn't done business with us
18 in six months, seven months, or very minimal would be
19 treated a little bit different than somebody --
20 possibly could be treated a little bit different than
21 somebody who was buying -- purchasing from us every
22 day.

23 Q. Would a customer -- a frequent customer be
24 granted increases -- if a -- if a customer frequently

1 ordered from Anda, would they be more likely to get a
2 control limit increase --

3 MS. KOSKI: Object to form.

4 BY MR. STOLTZ:

5 Q. -- upon request?

6 MS. KOSKI: Sorry. Object to form.

7 THE WITNESS: Not necessarily, no.

8 BY MR. STOLTZ:

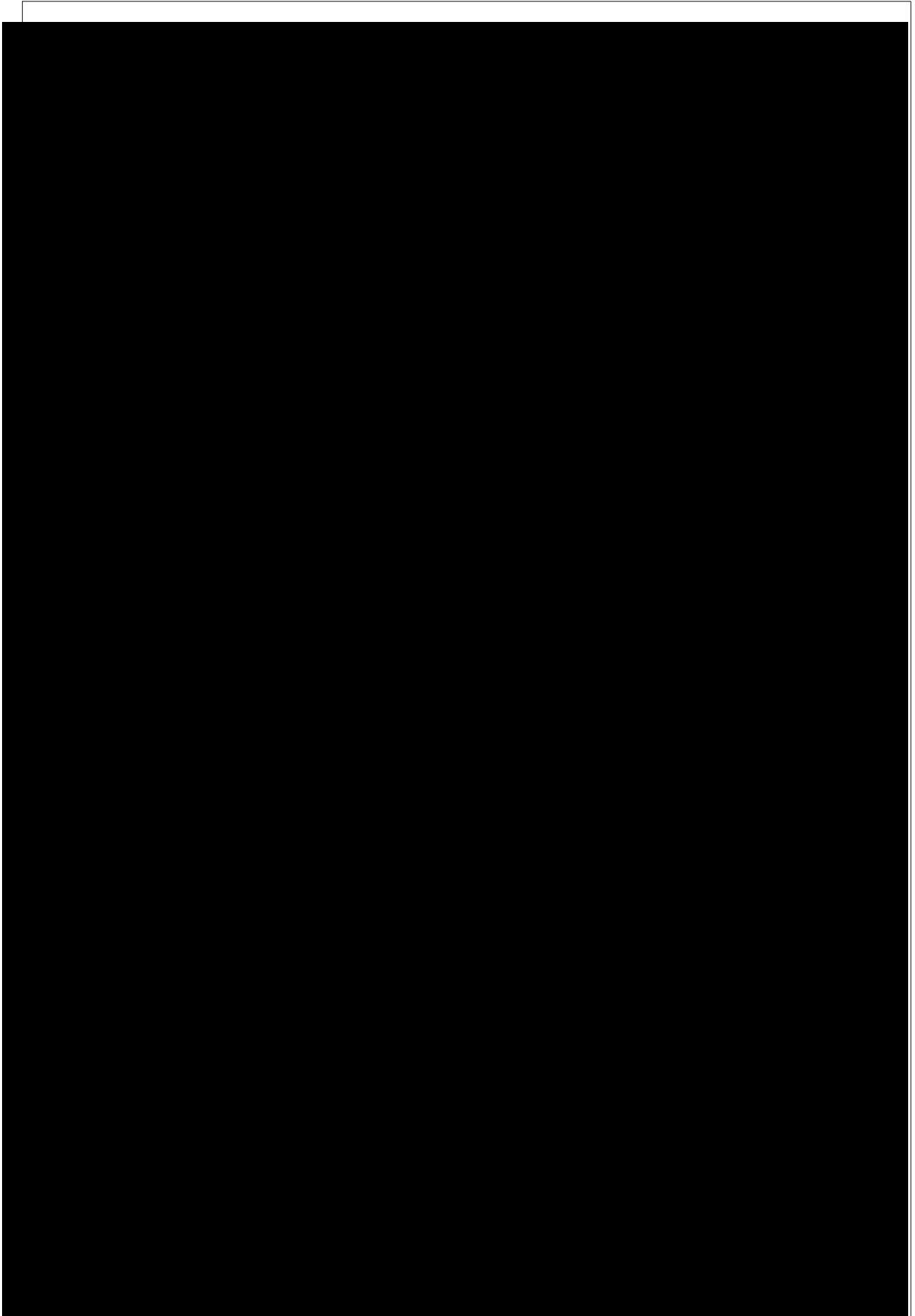
9 Q. But it would be relevant in deciding whether
10 or not a controlled limit increase would be granted
11 to that customer upon their request?

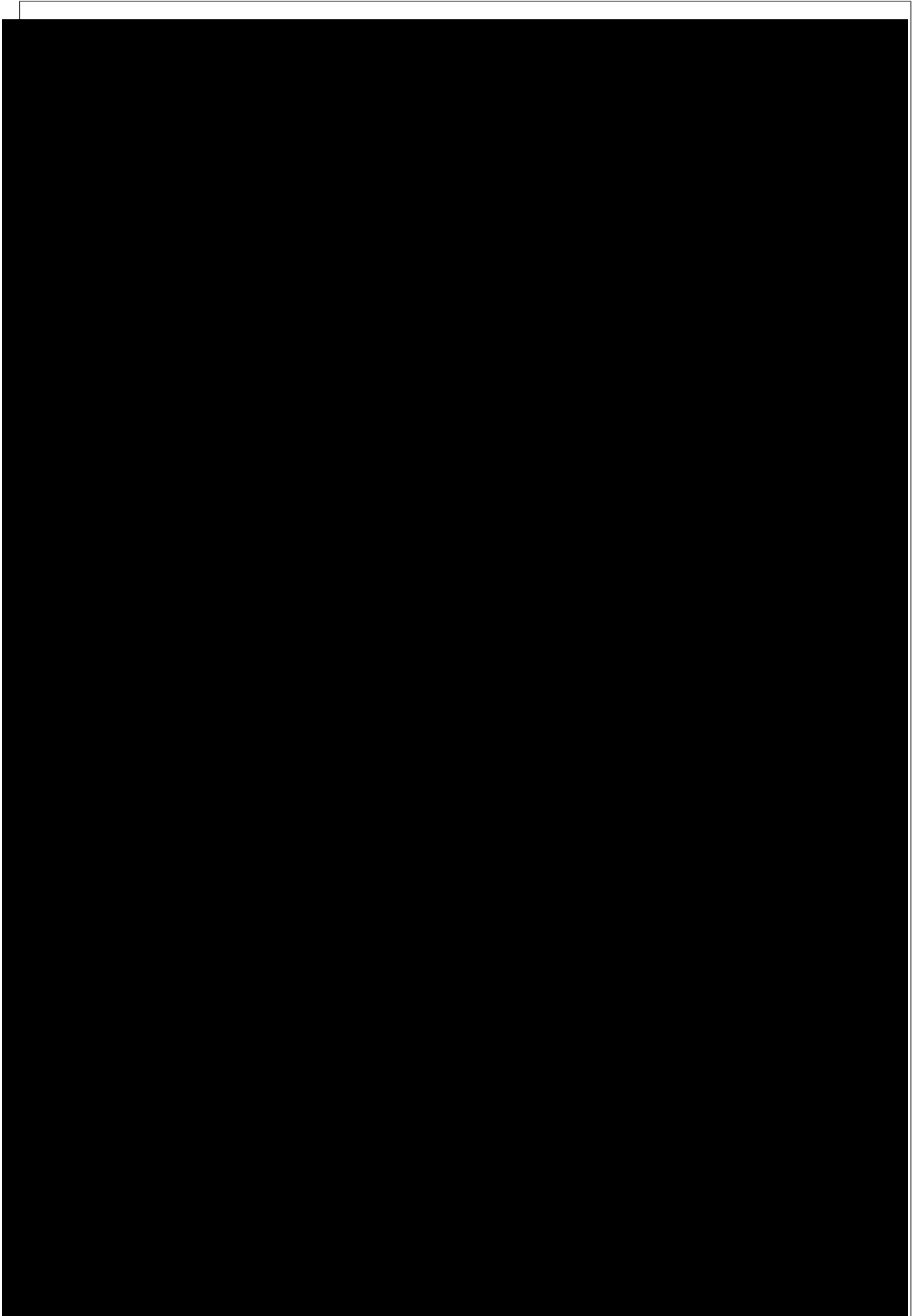
12 A. Each customer would be handled differently.
13 It would vary.

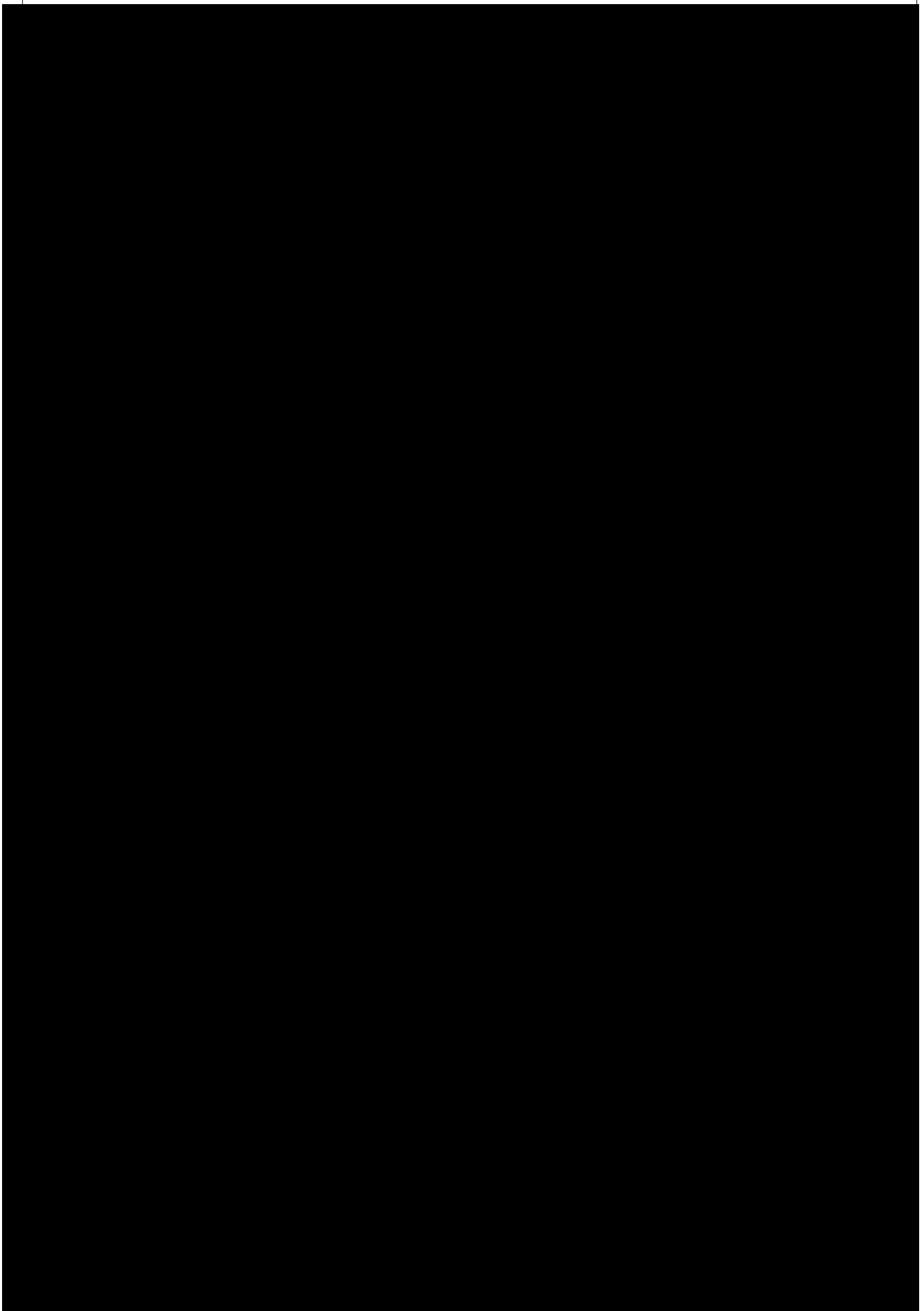
17 BY MR. STOLTZ:

18 Q. We discussed EPIC a little bit earlier when
19 we were going over buying groups?

20 A. Yes, sir.







12 Q. You weren't working in controlled substance
13 compliance in 2015 or 2014, right?

14 A. No, sir.

15 Q. And you weren't in charge of increasing
16 limits in 2014 or 2015 or even 2016, right?

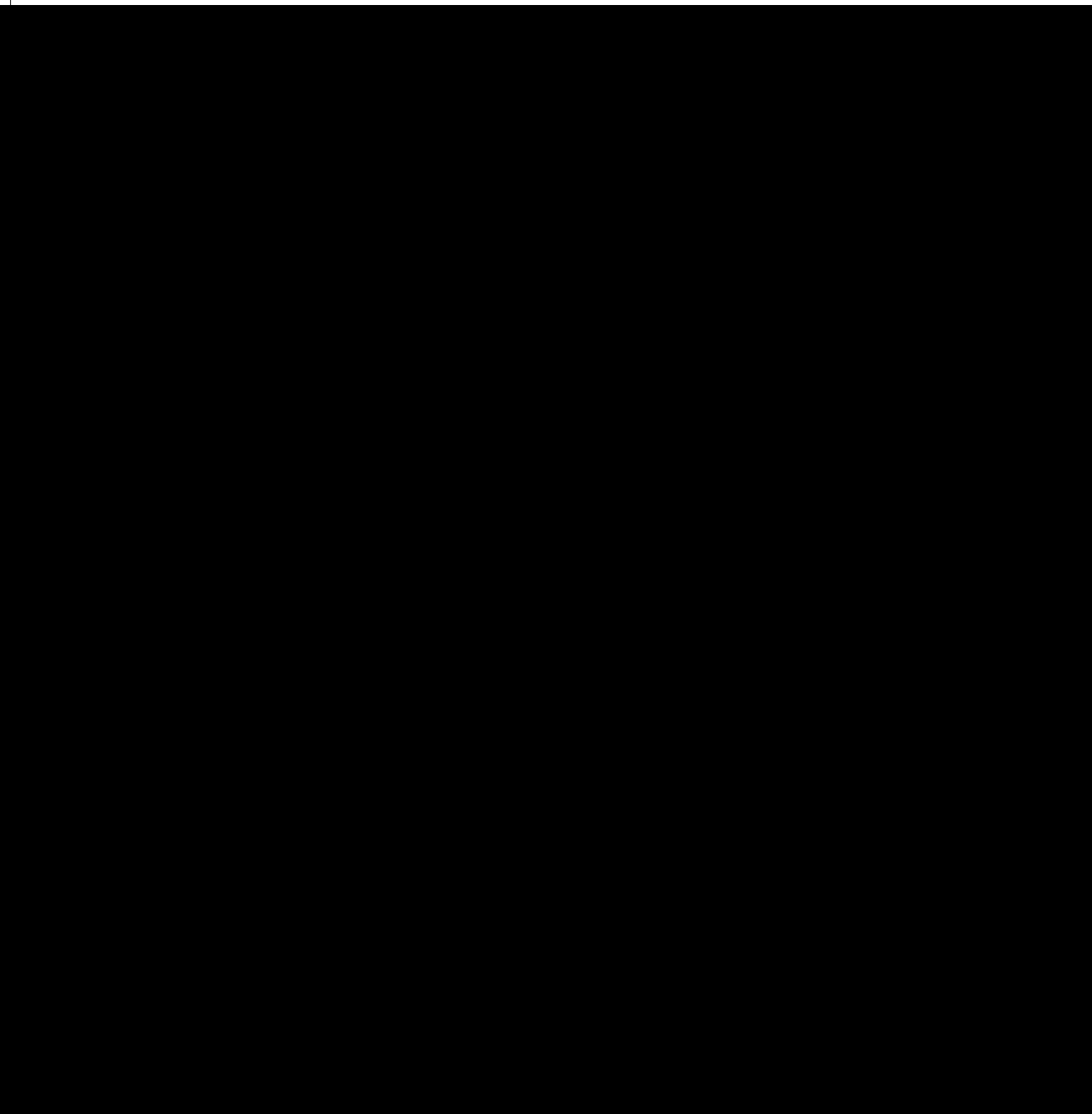
17 A. No, sir.

24 ///

1 BY MR. STOLTZ:

2 Q. How would you have any knowledge of 2014 or
3 2015 as far as increases being granted or why those
4 increases were granted?

5 A. We capture notes in our internal system, TPS.
6 But, again, I can't say for certain about these
7 specific cases.



15 Q. Has EPIC been an account since long before
16 July 2014?

17 MS. KOSKI: Object to form.

18 BY MR. STOLTZ:

19 Q. Wasn't EPIC an account when you were with
20 regulatory compliance -- or, excuse me, in controlled
21 substance compliance in 2011, 2012?

22 A. EPIC is not an account.

23 Q. EPIC is a buyer's club.

24 Was that a buying club that Anda distributed

1 controlled substances to when you were working with
2 controlled substance compliance in 2011 and 2012?

3 MS. KOSKI: Object to form.

4 THE WITNESS: I can't say for certain.

5 BY MR. STOLTZ:



13 MR. STOLTZ: My last exhibit, Exhibit 19.

14 (Anda - Hall Exhibit 19 was marked for

15 identification.)

16 THE WITNESS: Thank you.

17 MS. KOSKI: Thank you.

18 MR. STOLTZ: And this has the Bates

19 number 150162.

20 BY MR. STOLTZ:

1 Q. Was he a compliance analyst?

2 A. Yes, sir.



10 BY MR. STOLTZ:

11 Q. Could a customer be suspicious in the absence
12 of suspicious orders from a regulatory controlled
13 substance compliance?

14 A. Yes, sir.

15 Q. What are some ways in which a customer could
16 be suspicious in the absence of suspicious orders
17 with respect to controlled substance compliance?

18 A. A new account review. So this -- a new
19 account review as well as an increase -- internal
20 increase request.

21 Q. So -- so a customer -- you could determine
22 whether or not a customer was suspicious without ever
23 actually delivering an order to that customer?

24 A. Yes, sir.

1 Q. Okay. And that would be based on the
2 dispensing data that they provided you?

3 A. The due diligence, yes, sir.

4 Q. Okay.

5 MR. STOLTZ: I have no further questions.

6 MS. KOSKI: I don't have any questions.

7 MS. CARDENAS: No questions on my end.

8 MS. KOSKI: Any questions from anyone on the
9 telephone?

10 I think we're good.

11 THE VIDEOGRAPHER: The time is 5:20 p.m. We
12 are going off the record. This marks the end of
13 the deposition.

14 (Whereupon, the deposition concluded at
15 5:20 p.m.)

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1 C E R T I F I C A T E

2

3 I, KELLY J. LAWTON, Registered Professional
4 Reporter, Licensed Court Reporter, and Certified
5 Court Reporter, do hereby certify that, pursuant to
6 notice, the deposition of EMILY HALL was duly taken
7 on January 22, 2019, at 9:15 a.m. before me.

8 The said EMILY HALL was duly sworn by me
9 according to law to tell the truth, the whole truth
10 and nothing but the truth and thereupon did testify
11 as set forth in the above transcript of testimony.
12 The testimony was taken down stenographically by me.
13 I do further certify that the above deposition is
14 full, complete, and a true record of all the
15 testimony given by the said witness.

16

17

18 _____
KELLY J. LAWTON, RPR, LCR, CCR

19

20 (The foregoing certification of this
21 transcript does not apply to any reproduction of the
22 same by any means, unless under the direct control
23 and/or supervision of the certifying reporter.)

24

INSTRUCTIONS TO WITNESS

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Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it. It will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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2 E R R A T A

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4 PAGE LINE CHANGE

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1 ACKNOWLEDGMENT OF DEPONENT

2

3 I, EMILY HALL, do hereby acknowledge that I
4 have read the foregoing pages, 1 to 249, and that the
5 same is a correct transcription of the answers given
6 by me to the questions therein propounded, except for
7 the corrections or changes in form or substance, if
8 any, noted in the attached Errata Sheet.

9

10

11

12 _____
EMILY HALL

DATE

13

14

15

16

17 Subscribed and sworn to before me this

18 ____ day of _____, 20____.

19 My Commission expires: _____

20

21

Notary Public

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